



**Our conversation this morning regarding the former Beacon Truck Stop #652
UST cleanup site in Lupton, AZ**

Chris Prokop to: shay.wideman

04/07/2009 12:43 PM

Cc: henryhaven, Steven Linder, Carl Warren

Shay- Thanks for taking the time to speak with me this morning about the previous UST cleanup activities at the former Beacon Truck Stop #652 in Lupton, AZ (EPA ID# NAV-001). During our discussion, you indicated you would probably be Valero's Project Manager for this LUST site for the foreseeable future. You also indicated that Valero would probably send a letter to the U.S. EPA and the Navajo Nation EPA within about 3 weeks summarizing the current status, and potentially recommending a conference call and/or meeting in Window Rock to discuss the next steps (any in-person meeting might need to include Speedy's participation). Please send Valero's letter simultaneously to the two individuals listed below. It would probably be advisable to send Valero's letter via email in "pdf" to accelerate the review process (please refer to the "cc" list above).

- 1) Mr. Steven C. Linder, P.E., Manager
Underground Storage Tanks Program Office
U.S. EPA (WST-8)
75 Hawthorne Street
San Francisco, CA 94105
- 2) Ms. Diane Malone
Environmental Department Manager
Waste Regulatory Compliance Department
Navajo Nation EPA
P.O. Box 3089
Window Rock, AZ 86515

Please "cc" Henry Haven of the Navajo Nation EPA at the same address listed above (Henry is the head of NNEPA's LUST team). In addition, please "cc" me and Carl Warren of U.S. EPA at the same address and mail code listed above.

I've included my notes from this morning's phone discussion below. Please let me know if I've accurately characterized our discussion. Thank you, Chris Prokop, U.S. EPA, phone: 415-972-3363, fax: 415-947-3530.

My notes from our 4/7/09 phone discussion on the former Beacon Truck Stop #652 LUST site

- Since July 2007, Valero has gone through at least one reorganization, which resulted in a shift in the Project Manager duties for the former Beacon Truck Stop #652 LUST site (the LUST site).
- You are currently the Project Manager for most, or all, of Valero's cleanup sites that don't have active fueling facilities ("non-operating" sites), and this includes the LUST site.
- An SVE pilot study was conducted at the LUST site following Burgess & Niple's 7/19/06 letter report recommending this. This pilot study was not favorable on the use of SVE at the LUST site.
- GES (Phoenix consulting firm) recently completed an extensive file review of the LUST site, the active Speedy's fueling facility on the same (?) property, and related issues. You are currently reviewing GES' report.
- Valero will be conducting a "fresh review" of the LUST site and all related issues.

Former Beacon Truck Stop #652 (NAV-001), I-40 and Grant Road, Lupton, AZ

- The 12/5/89 UST notification form listed 7 USTs [5 were 20 years old (installed about 1970), and the other 2 were of "unknown" age). Ultramar, Inc. was listed as the owner of the USTs. Valero bought some portion, or albot Ultramar sometime before EPA's 12/8/06 letter to NNEPA, which described Ultramar as the "former owner".
- In April 1986, site assessment work began with the installation of 2 wells (MW-1/2). Two additional wells (MW-3/4) were installed in December 1986, and two more (MW-5/6) in October 1991. Wells MW-7, 8 & 9 had been installed as of Burgess & Niple's (Ultramar's consultant) 4/29/04 report to EPA. Figure 1 of this Report showed the following wells as being abandoned: MW-1, 2 (replaced by 2A), 5, 6, 7 & 9.
- Monitored natural attenuation (MNA) reportedly occurred during 1992-1996.
- In 1996/7, 8 USTs were removed from 2 locations on the southern portion of the property. At about this same time, or shortly thereafter, 3 new USTs were installed about 30 feet north of one of the former UST locations (these active USTs are currently operated by Speedy's Truck Stop).
- During 1997-1999, SVE was reportedly conducted around MW-1.
- MNA was again utilized during 1999-2004.
- EPA's 12/30/03 letter in Ultramar required enhanced bioremediation with oxygen and nutrients at MW-2A, but there is no file documentation indicating this was ever implemented.
- In April 2005, Burgess and Niple installed five new "monitor/treatment" wells (MW-10 to MW-14) within the former UST pit. MW-10, 11 & 14 had unexpectedly high benzene concentrations ranging from 12,000 to 34,000 ug/l. Burgess & Niple's 8/22/05 Report concluded that releases from the nearby, active UST system operated by Speedy's had caused these benzene concentration spikes. This conclusion was based, in part, on a 10+ year record of monitoring MW-2 (in the former UST pit), during which the benzene concentrations had dropped from 5,000 to 420 ug/l. The Report also alleged that there had been construction mistakes during the installation of Speedy's USTs in 1996/7. The Report stated that a remedial plan would NOT be developed until the source of the increased hydrocarbon contamination was verified. EPA's 12/8/06 letter supported the possibility of a Speedy's source for the increased hydrocarbon contamination at MW-2A.
- In December 2005, Burgess & Niple conducted a "forensic analysis" (fuel fingerprint study) to compare free product in monitoring wells to the fuel in Speedy's active dispensers. The fingerprint study (Report dated 4/20/06) was inconclusive, but free product was found in MW-10 (0.16 feet), MW-11 (1.38 feet), and MW-12 (0.90 feet).
- On 6/22/06, Burgess and Niple initiated free product removal activities. Free product was found at MW-10 (0.21 feet), MW-11 (1.42 feet), and MW-12 (1.52 feet). The following amounts of free product were removed from these same wells, respectively: 0.13 gallon, 0.9 gallon, and 1.0 gallon. The 7/19/06 letter report to Henry Haven (copying Walt Guggenheimer) stated that an SVE pilot test would be conducted soon.
- On 4/2/09, I contacted Thomas Sexton of Valero (current owner) by phone and email, and he agreed to give me a corrective action update by mid-April. On 4/3/09, Chip Simpson of Burgess & Niple's Phoenix office (602-244-8100) informed me that Burgess & Niple had done no additional work at this site after its 7/19/06 letter report.
- EPA's 12/30/03 letter to Ultramar also required an investigation of the source of the above-MCL benzene concentrations in the vicinity of MW-08 (6.0 ug/l in 2003) and at the "one-time" groundwater sampling location WS-03 (22 ug/l in 2003) in the northern portion of the property. MW-8 is about 400 feet northeast of the 8 former USTs that were removed by Ultramar in 1996/7. Burgess & Niple's reply to the EPA letter was that this northern contamination was probably not associated with its client's (Ultramar's) southern contamination, but more likely linked to Speedy's active USTs.
- Arthur Boone's 3/25/04 memo-to-file noted that the original property owner was John Knight, who then sold it to Ultramar/Beacon (now owned, in part or whole, by Valero). I believe the Nicholson family owns the active Speedy's station at this site.

*From my 4/3/09 email
to Carl Warren.
C. Prokop*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
Underground Storage Tanks Program Office
75 Hawthorne Street (WST-8)
San Francisco, CA 94105

December 30, 2003

REFER TO WST-8
AND SITE #NAV-001L
Certified Mail: 7000 0520 0021 6109 5176

Mr. Robert Fishburn
Senior Project Manager
Ultramar, Inc.
685 West Third Street
Hanford, CA 93230

Dear Mr. Fishburn:

This correspondence refers to the document entitled "Site Groundwater Investigation Report and Groundwater Sampling Activities", dated October 29, 2003, that was prepared by Allen, Stephenson & Associates for the former Beacon Truck Stop #652 in Lupton, AZ, on land of the Navajo Nation.

The above-mentioned report claims that there are at least two independent groundwater contaminant plumes at this site. The southern plume appears to be related to the four underground storage tanks (USTs) that were removed in front of the restaurant in the early 1990's. The second groundwater contaminant plume around wells MW-08 and WS-03 shows no clear source for the benzene concentrations that are above EPA's 5.0 $\mu\text{g/l}$ MCL.

EPA and the Navajo Nation EPA (NNEPA) require that the following actions be undertaken at the former Beacon Truck Stop:

- * Apply enhanced bioremediation at the southern plume by introducing nutrients and oxygen into the groundwater to stimulate contaminant breakdown. Collect samples at 6-month intervals from MW-02A and WS-02 for laboratory analysis. Use EPA method 8021 for benzene, toluene, ethylbenzene and xylenes (BTEX) and methyl tertiary-butyl ether (MTBE). Use EPA method 8015 for total petroleum hydrocarbons (TPH) modified for gasoline. Submit the results to EPA and NNEPA within 60 days of sample collection.
- * Investigate the source of groundwater contamination around MW-08, WS-03 and WS-06. Collect samples annually from these three wells for laboratory analysis using the above-mentioned EPA analytical methods. Submit copies of the results to EPA and NNEPA within 60 days of sample collection. Drill additional wells as necessary to define contaminant plume migration.
- * Maintain WS-01A, WS-05 and WS-04 on stand-by for possible future sampling.

Please call Walt Guggenheimer of my staff at (415) 972-3377 or Henry Haven of the NNEPA at (928) 871-7997 if you have questions or need more information.

Sincerely,



Lester Kaufman, Manager
Underground Storage Tanks Program Office

Enclosure

cc: Henry Haven, Navajo Nation EPA
Alan Downer, Navajo Nation HPD
Quentin Galbraith, Speedy Convenience Inc.

ENCLOSURE: LIST OF CONTACTS

Henry Haven, Geologist
Navajo Nation Environmental Protection Agency
P. O. Box 339
Window Rock, AZ 86515 (928) 871-7997

Alan Downer, Director
Navajo Nation Historic Preservation Department
P. O. Box 9000
Window Rock, AZ 86515 (928) 871-6437

Quentin Galbraith, Environmental Supervisor
Speedy Convenience Inc.
710 E- 20th Street
Farmington, NM 87401 (505) 327-4963



BURGESS & NIPLE

Mr. Walt Guggenheimer
Underground Storage Tank Programs Office
United States Environmental Protection Agency
75 Hawthorne Street (WST-8)
San Francisco, CA 94105

Re Former Beacon Truck Stop #652
#NAV-001L

April 29, 2004

Burgess & Niple, Inc.

5025 East Washington Street
Suite 212
Phoenix, AZ 85034
602 244.8100
Fax 602 244.1915

Dear Mr. Guggenheimer:

Ultramar, Inc. (Ultramar) has retained Burgess & Niple (B&N) to provide environmental consulting support associated with the referenced leaking underground storage tank (LUST) case file. The LUST facility is situated within Navajo Nation Tribal Land and located in Lupton, Arizona. Consequently, the Environmental Protection Agency (EPA) and Navajo Nation EPA serve as the regulatory authorities pertaining to the LUST release.

~~Ultramar has been monitoring the release since 1987 following the removal of the former UST system. The current UST system has been owned and operated by Speedy's Truck Stop since May 1996. Ultramar's recent site investigation and groundwater monitoring (July 2003) was summarized in a report dated October 29, 2003. The scope of services implemented by Ultramar were consistent with the EPA approved work plan. Results of the groundwater investigation confirm two sources of petroleum hydrocarbons appear to be contributing to the dissolved petroleum hydrocarbons detected in monitor wells MW-02A and MW-08 (Figure 1; Attachment I).~~

Subsequent to EPA's review of the site groundwater investigation report, Ultramar received written notice from EPA (December 30, 2003) requesting additional services to be implemented in regards to the UST release and the other identified source area. Based on the three actions requested by EPA, there appears to be some misunderstanding regarding the site investigation work reported by Allen, Stephenson & Associates (ASA).

~~The action items requested by EPA are presented below and followed with a direct response to the requested action:~~

- ~~"Apply enhanced bioremediation at the southern plume by introducing nutrients and oxygen into the groundwater to stimulate contaminant breakdown. Collect samples at 6-month intervals from MW-02A and WS-02 for laboratory analysis. Use EPA method 8021 for benzene, toluene, ethylbenzene and xylenes (BTEX) and methyl tertiary-butyl ether (MTBE). Use EPA method 8015 for total~~

petroleum hydrocarbons (TPH) modified for gasoline. Submit results to EPA and NNEPA within 60 days of sample collection."

B&N and Ultramar agree with EPA regarding the implementation of an enhanced bioremediation program designed to reduce dissolved petroleum hydrocarbon concentrations in the vicinity of MW-02A. ~~B&N is evaluating available treatment technologies based on cost effectiveness, remedial effectiveness and suitability to site conditions.~~ B&N and Ultramar will present their determination to EPA under a separate cover. In addition, the groundwater sampling and monitoring program at MW-02A will also be addressed along with the selected enhanced bioremediation program.

The EPA has requested that WS-02 be monitored and sampled every 6 months. The sampling points identified with a "WS" (water sample) designation correspond with a groundwater investigation completed by ASA during July 2003 pursuant to EPA's directive to assess and define the horizontal extent of groundwater petroleum hydrocarbons in the vicinity of MW-02A and MW-08. ~~The "WS" locations were drilled as single point sampling events and were abandoned following sample collection. The "WS" designated locations are not accessible for additional sampling and monitoring.~~

- ~~"Investigate the source of groundwater contamination around MW-08, WS-03, and WS-06. Collect samples annually from these three wells for laboratory analysis using the above-mentioned EPA analytical methods. Submit copies of the results to EPA and NNEPA within 60 days of sample collection. Drill additional wells as necessary to define contaminant plume migration."~~

~~The "WS" designated locations, as described previously, were single point sampling events and can no longer be accessed for long term monitoring or sampling.~~

EPA requests that the source of groundwater contamination in the vicinity of MW-08 be investigated. The source of hydrocarbons in the vicinity of MW-08 ("northern plume") does not appear to be attributed to the southern plume near MW-02A. EPA's request for additional investigation of the petroleum hydrocarbon source would require the need to install additional monitor wells or hydropunch groundwater sampling be completed. ASA's July 2003 groundwater investigation shows the groundwater plume delineated to concentrations below the benzene maximum contaminant level north, south and east of MW-08. These results suggest that the northern hydrocarbon plume originates west or southwest of MW-08.

At this time, dissolved phase hydrocarbon concentrations in and around MW-08 appear to be appropriately assessed up-gradient, down-gradient and cross-gradient. However, potential sources contributing to the northern plume could be the current UST system and associated fuel dispenser network. Therefore, it

April 29, 2004
Page 3

would appear that Ultramar Inc. should not be responsible for any additional assessment activities in the vicinity of MW-08.


- "Maintain WS-01A, WS-05 and WS-04 on stand-by for possible future sampling."

The "WS" designated locations were single point hydropunch sampling events completed during July 2003 and can no longer be accessed for long term monitoring or sampling.

Results of the July 2003 groundwater investigation and the recent enforcement issues should be considered when evaluating and requesting additional investigation and/or monitoring at the site as it pertains to Ultramar's responsibilities. Should you have any questions or require additional documentation, please contact Mr. Robert Fishburn, Ultramar's Senior Project Manager at (559) 583-3251 or me at (602) 244-8100.

Sincerely,

583-3345



Dino Gotsis
Project Manager

cc Robert Fishburn, Ultramar
Henry Haven, Navajo Nation EPA

Attachment:

P/34914/doc/34914EPAtr

ATTACHMENT I

FIGURE



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
Underground Storage Tanks Program Office
75 Hawthorne Street (WST-8)
San Francisco, CA 94105**

December 30, 2003

**REFER TO WST-8
AND SITE #NAV-001L
Certified Mail: 7000 0520 0021 6109 5176**

Mr. Robert Fishburn
Senior Project Manager
Ultramar, Inc.
685 West Third Street
Hanford, CA 93230

Dear Mr. Fishburn:

This correspondence refers to the document entitled "Site Groundwater Investigation Report and Groundwater Sampling Activities", dated October 29, 2003, that was prepared by Allen, Stephenson & Associates for the former Beacon Truck Stop #652 in Lupton, AZ, on land of the Navajo Nation.

The above-mentioned report claims that there are at least two independent groundwater contaminant plumes at this site. The southern plume appears to be related to the four underground storage tanks (USTs) that were removed in front of the restaurant in the early 1990's. The second groundwater contaminant plume around wells MW-08 and WS-03 shows no clear source for the benzene concentrations that are above EPA's 5.0 $\mu\text{g/l}$ MCL.

EPA and the Navajo Nation EPA (NNEPA) require that the following actions be undertaken at the former Beacon Truck Stop:

- * Apply enhanced bioremediation at the southern plume by introducing nutrients and oxygen into the groundwater to stimulate contaminant breakdown. Collect samples at 6-month intervals from MW-02A and WS-02 for laboratory analysis. Use EPA method 8021 for benzene, toluene, ethylbenzene and xylenes (BTEX) and methyl tertiary-butyl ether (MTBE). Use EPA method 8015 for total petroleum hydrocarbons (TPH) modified for gasoline. Submit the results to EPA and NNEPA within 60 days of sample collection.
- * Investigate the source of groundwater contamination around MW-08, WS-03 and WS-06. Collect samples annually from these three wells for laboratory analysis using the above-mentioned EPA analytical methods. Submit copies of the results to EPA and NNEPA within 60 days of sample collection. Drill additional wells as necessary to define contaminant plume migration.
- * Maintain WS-01A, WS-05 and WS-04 on stand-by for possible future sampling.

Please call Walt Guggenheimer of my staff at (415) 972-3377 or Henry Haven of the NNEPA at (928) 871-7997 if you have questions or need more information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lester Kaufman".

Lester Kaufman, Manager
Underground Storage Tanks Program Office

Enclosure

cc: Henry Haven, Navajo Nation EPA
Alan Downer, Navajo Nation HPD
Quentin Galbraith, Speedy Convenience Inc.

ENCLOSURE: LIST OF CONTACTS

Henry Haven, Geologist
Navajo Nation Environmental Protection Agency
P. O. Box 339
Window Rock, AZ 86515 (928) 871-7997

Alan Downer, Director
Navajo Nation Historic Preservation Department
P. O. Box 9000
Window Rock, AZ 86515 (928) 871-6437

Quentin Galbraith, Environmental Supervisor
Speedy Convenience Inc.
710 E- 20th Street
Farmington, NM 87401 (505) 327-4963

BURGESS & NIPLE

Ms. Laura L. Malone, Manager
Hazardous Waste Inspections & Compliance Unit
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix, AZ 85007

Re Speedy's Truck Stop 21387
Notice of Violation

March 29, 2004

Burgess & Niple, Inc.

5025 East Washington Street
Suite 212
Phoenix, AZ 85034
602 244.8100
Fax 602 244.1915

Dear Ms. Malone:

The Arizona Department of Environmental Quality (ADEQ) issued a Notice of Violation (NOV; Case ID 28959) to Speedy's Truck Stop (Speedy's) following an inspection performed at the facility on February 24, 2004. One of the line items listed in the NOV, "Documenting Compliance" line item "1." requests that waste determinations be provided for the waste tank, three 55-gallon drums labeled as non-hazardous waste, eight 55-gallon drums labeled waste pending analysis and one 55-gallon drum labeled waste material.

Two of the wastes identified by ADEQ, the eight 55-gallon drums labeled non-hazardous waste and the three 55-gallon drums labeled waste pending analysis, are associated with an on going leaking underground storage tank (LUST) site characterization and monitoring program being performed at the facility by Ultramar, the former facility owner. The LUST case file (NAV001) investigation is being overseen and directed by the Environmental Protection Agency (EPA) Region 9 and the Navajo EPA. The liquid and sludge in the waste tank and the container labeled as waste material are not associated with the LUST case file and are not the responsibility of Ultramar, Inc.

Ten of the eleven 55-gallon drums associated with the LUST investigation contain purge water, development water and rinsate, and the remaining drum contains drill cuttings. The containerized water and drill cuttings were generated from groundwater sampling, monitor well installation and site characterization services completed during 2003. Analytical laboratory results collected from the site monitor wells and the hydropunch sampling event are enclosed (Attachment I) and represent the dissolved petroleum hydrocarbons present in the containerized water. No analytical laboratory data is available for the drill cuttings; however, the petroleum impacted soil was containerized based on field screening methods.

Ultramar will be contracting with Philip Transportation and Remediation (PTR) for the removal, transport and disposal of the water and drilling cuttings. According to PTR, the water will be transported to the Fernley Facility in Nevada for treatment and disposal. The drill cuttings will be consolidated and transported to the U.S. Ecology Facility in Nevada for disposal. PTR is available to remove the containerized water

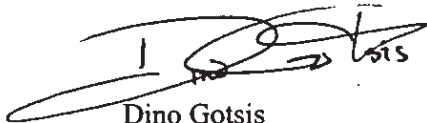
March 29, 2004

Page 2

and drill cuttings from the site as early as Tuesday, March 29, 2004. Waste manifest documentation will be forwarded to ADEQ upon removal of the containerized water and drill cuttings.

Should you require any additional documentation related to Ultramar's Site Characterization services, please contact Mr. Robert Fishburn, Ultramar's Senior Project Manager at (559) 583-3251 or me at (602) 244-8100.

Sincerely,

A handwritten signature in black ink, appearing to read "Dino Gotsis", with a large, sweeping underline.

Dino Gotsis
Project Manager

cc Robert Fishburn, Ultramar
Walt Guggenheimer, EPA Region 9
Ross Kennemer, Animas Environmental Services
Mark Nicholson, Speedy's Truckstop
Henry Haven, Navajo Nation EPA

Attachment: Analytical Laboratory Report

ATTACHMENT A

Analytical Laboratory Report



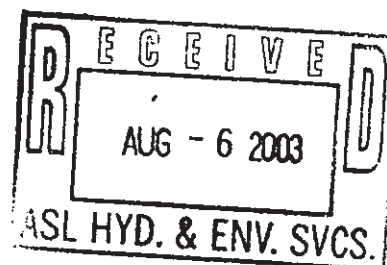
TRANSWEST
GEOCHEM

August 05, 2003

Dino Gotsis
Allen, Stephenson & Associates
1130 E. Missouri Ave., Suite 110
Phoenix, AZ 85014

RE: Speedy's Truckstop/337.12
Work Order No.: 0307387

Dear Dino,



Transwest Geochem, Inc. received 35 samples on 7/26/2003 9:30:00 AM for the analyses presented in the following report.

The Case Narrative of this report addresses any Quality Control and/or Quality Assurance issues associated with this Work Order.

If you have any questions regarding these test results, please feel free to call us at (602) 437-0330.

Sincerely,

Vic Nielsen
Project Manager

ADHS License No. AZM133/AZ0133

Client: Allen, Stephenson & Associates
Work Order: 0307387
Project Name: Speedy's Truckstop
Project Number: 337.12

Date Printed: 05-Aug-03

Case Narrative

All method blanks, laboratory spikes, and/or matrix spikes met quality control objectives for the parameters associated with this Work Order except as detailed below or on the Data Qualifier page of this report. Data Qualifiers used in this report are in accordance with ADEQ Arizona Data Qualifiers, Revision 1.0 05/13/2002.

Data qualifiers ("flags") contained within this analytical report have been issued to explain a quality control deficiency, and do not affect the quality (validity) of the data unless noted otherwise in the case narrative.

Analytical Comments for Method SW8260B, Sample 0307387-30, Batch D30730A:
The pH of this sample was 7 as determined by test strip.

Analytical Comments for Method SW8260B, Sample 0307387-26, Batch D30730A:
The pH of this sample was 7 as determined by test strip.

Analytical Comments for Method SW8260B, Matrix Spike 0307387-26, Batch N30731A: The pH of this sample was 7 as determined by test strip.

Analytical Comments for Method SW8260B, Matrix Spike Duplicate 0307387-26, Batch N30731A:
The pH of this sample was 7 as determined by test strip.



**TRANSWEST
GEOCHEM**

Date Printed 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates
Project Name: Speedy's Truckstop
Project Number: 337.12
Work Order: 0307387
Date Received: 26-Jul-03

Case Narrative
Data Qualifiers

One or more of the following data qualifiers may be associated with your analytical and/or quality control data.

- D1 Sample required dilution due to matrix interference. See case narrative.
D2 Sample required dilution due to high concentration of target analyte.



TRANSWEST
GEOCHEM

Date Printed 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates

Project Name: Speedy's Truckstop

Project Number: 337.12

Work Order: 0307387

Date Received: 26-Jul-03

Work Order Sample Summary

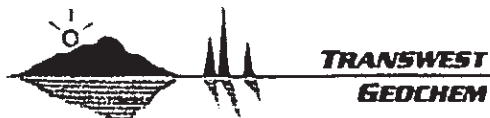
Client Sample ID	Lab Sample ID	Test Code	Collection Date
WS-01A	0307387-26A	SW8260B	7/22/2003 2:30:00 PM
	0307387-26B	8015MOD	7/22/2003 2:30:00 PM
WS-02	0307387-27A	SW8260B	7/22/2003 5:45:00 PM
	0307387-27B	8015MOD	7/22/2003 5:45:00 PM
WS-03	0307387-28A	SW8260B	7/23/2003 12:45:00 PM
	0307387-28B	8015MOD	7/23/2003 12:45:00 PM
WS-04	0307387-29A	SW8260B	7/23/2003 5:00:00 PM
	0307387-29B	8015MOD	7/23/2003 5:00:00 PM
WS-05	0307387-30A	SW8260B	7/24/2003 11:30:00 AM
	0307387-30B	8015MOD	7/24/2003 11:30:00 AM
WS-06	0307387-31A	SW8260B	7/25/2003 1:10:00 PM
	0307387-31B	8015MOD	7/25/2003 1:10:00 PM
MW-2A	0307387-32A	SW8260B	7/25/2003 10:00:00 AM
	0307387-32B	8015MOD	7/25/2003 10:00:00 AM
MW-4	0307387-33A	SW8260B	7/24/2003 3:45:00 PM
	0307387-33B	8015MOD	7/24/2003 3:45:00 PM
MW-8	0307387-34A	SW8260B	7/24/2003 5:20:00 PM
	0307387-34B	8015MOD	7/24/2003 5:20:00 PM
Trip Blank	0307387-35A	SW8260B	7/22/2003 2:30:00 PM



CLIENT: Allen, Stephenson & Associates
Project Name: Speedy's Truckstop
Project Number: 337.12
Work Order: 0307387
Date Received: 26-Jul-03

Definitions

Analytical Spike (AS)	The AS is a known amount of a target analyte added to a sample after it has been distilled, digested, or extracted and is ready for analysis. The AS is generally performed if the MS has failed. It is used to indicate interference that arises from sample distillation, digestion, or extraction as opposed to interference that is innate to the matrix.
Continuing Curve Verification (CCV)	The CCV is also referred to as a curve check. This is a standard analyzed at specified intervals during an analysis. The CCV verifies the stability and accuracy of the calibration curve. There are specific CCV recovery acceptance criteria for each method.
Dilution Factor (DF)	The DF is an indication of how much a sample had to be diluted in order to quantitate it on a standard curve. The DF is indicated in the reported sample result. The sample PQL increases as the dilution increases.
Internal Standard (IS)	The IS is a compound that is similar to the organic compound of interest in terms of chemical composition but is unique in that it is rare in the environment. The same concentration of IS is added to every sample for some organic methods.
Laboratory Control Sample (LCS)	The LCS is also referred to as a blank spike. The LCS is an addition of a known amount of a target analyte (from the same source as calibration standards or spikes) to an aliquot of deionized water or other appropriate clean matrix. The LCS is processed through the entire method procedure in the same manner as samples.
Matrix Spike (MS)	The MS is a known amount of a target analyte added to a sample. The MS is processed through the entire method procedure in the same manner as samples.
Method Blank (MB)	The MB is an aliquot of deionized water or other appropriate clean matrix that is thought to be free of the analyte in question. The MB is processed through the entire extraction or analysis procedure and is used to indicate contamination in the lab.
Method Detection Limit (MDL)	The MDL is the lowest level of detection of which a method is capable.
Practical Quantitation Limit (PQL)	The PQL is the lowest value at which Transwest Geochem can detect an analyte in matrix with a high degree of confidence. The PQL will increase as the DF increases. The PQL is greater than or equal to the MDL.
Relative Percent Difference (RPD)	The RPD is a measure of precision (the ability to obtain the same result on re-analysis of the same sample). It is calculated using the result of a sample, MS, LCS, or LCSV and its associated duplicate result.
Secondary Source QC Sample (LCSV)	The LCSV is also referred to as a second source laboratory control sample. It is the same type of standard as a calibration or spiking standard but is obtained from a different source. The LCSV is an indication of the primary standard quality, method performance, and instrument performance.
Surrogate	A surrogate compound is similar to the organic compound of interest in terms of chemical composition but is unique in that it is rare in the environment. When surrogates are used, they are added to every sample, blank and standard. Surrogate recovery is used as an indication of extraction and/or analytical success.
Trip Blank (TB)	The TB is a portion of deionized water preserved in the same manner as the samples. The TB travels from the lab, to the field, and then back to the lab with the samples from the field. The TB serves as an indication of contamination introduced during sample transportation.



Date Printed 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates
Project Name: Speedy's Truckstop
Project Number: 337.12
Work Order: 0307387
Date Received: 26-Jul-03

References

Transwest Geochem, Inc. uses the methods outlined in the following references:

Code of Federal Regulations, 40CFR, Part 136, Appendix A, 1998.

Standard Methods for the Examination of Water and Wastewater, 19th Edition, 1995.

Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, Revised March 1983.

Methods for the Determination of Inorganic Substances in Environmental Samples, EPA/600/R-93/100, Revised August 1993.

Methods for the Determination of Metals in Environmental Samples, Supplement 1: EPA/600/R-94/111, Revised May 1994.

Methods for the Determination of Organic Compounds in Drinking Water, EPA/600/4-88/039, Revised July, 1991; EPA-600/4-90/020, Supplement I, July 1990; EPA-600/R-92/129; Supplement II, August 1992; EPA-600/R-95/131, Supplement III, August 1995.

Hach, Water Analysis Handbook, 3rd Edition, 1997.

Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, 3rd Edition, 1986 including Update I, July 1992; Update IIA, August 1993; Update II; September 1994; Update IIB, January 1995; Update III, December 1996

Bureau of Laboratory Services, State of Arizona Department of Health Services Method 418.1AZ: TPH in Soil, September 1994.

Bureau of Laboratory Services, State of Arizona Department of Health Services Method 8015AZ.R1, September 1998. (Comment: C6-C10 GRO reported by this method is not to be used in compliance situations)

ASTM MethodD4982, Annual Book of ASTM Standards, Volumes 11.01 and 11.02, 1995

The Determination of Polychlorinated Biphenyls in Transformer Fluid and Waste Oils, EPA-600 4-81-045, September 1982.



**TRANSWEST
GEOCHEM**

Date Printed 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates
Work Order: 0307387
Lab ID: 0307387-26
Project Name: Speedy's Truckstop
Project Number: 337.12

Client Sample ID: WS-01A
Collection Date: 7/22/2003 2:30:00 PM
Matrix: AQUEOUS

Analyte	Result	PQL	Qual	Units	DF	Test Code	Date Prepared	Date Analyzed	Analyst	Batch ID
C6-C10 GRO	<2.0	2.0		mg/L	1.0	8015MOD	7/31/03	7/31/03 19:46	SMC	FUELS1_030731A
C10-C22 DRO	<3.0	3.0		mg/L	1.0	8015MOD	7/31/03	7/31/03 19:46	SMC	FUELS1_030731A
C22-C32 ORO	<10	10		mg/L	1.0	8015MOD	7/31/03	7/31/03 19:46	SMC	FUELS1_030731A
o-Terphenyl(Surrogate)	104	66-147		%REC	1.0	8015MOD	7/31/03	7/31/03 19:46	SMC	FUELS1_030731A
Benzene	<0.50	0.50		µg/L	1.0	SW8260B	N/A	7/30/03 12:46	JH	D30730A
Ethylbenzene	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 12:46	JH	D30730A
Methyl tert-butyl ether	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 12:46	JH	D30730A
Toluene	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 12:46	JH	D30730A
Xylenes, Total	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 12:46	JH	D30730A
4-Bromofluorobenzene(Surrogate)	85	75-108		%REC	1.0	SW8260B	N/A	7/30/03 12:46	JH	D30730A
Dibromofluoromethane(Surrogate)	101	71-109		%REC	1.0	SW8260B	N/A	7/30/03 12:46	JH	D30730A
1,2-Dichloroethane-d4(Surrogate)	102	64-119		%REC	1.0	SW8260B	N/A	7/30/03 12:46	JH	D30730A
Toluene-d8(Surrogate)	93	78-107		%REC	1.0	SW8260B	N/A	7/30/03 12:46	JH	D30730A



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Date Printed 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates

Client Sample ID: WS-02

Work Order: 0307387

Collection Date: 7/22/2003 5:45:00 PM

Lab ID: 0307387-27

Matrix: AQUEOUS

Project Name: Speedy's Truckstop

Project Number: 337.12

Analyte	Result	PQL	Qual	Units	DF	Test Code	Date Prepared	Date Analyzed	Analyst	Batch ID
C6-C10 GRO	<2.0	2.0		mg/L	1.0	8015MOD	7/31/03	7/31/03 20:37	SMC	FUELS1_030731A
C10-C22 DRO	<3.0	3.0		mg/L	1.0	8015MOD	7/31/03	7/31/03 20:37	SMC	FUELS1_030731A
C22-C32 ORO	<10	10		mg/L	1.0	8015MOD	7/31/03	7/31/03 20:37	SMC	FUELS1_030731A
o-Terphenyl(Surrogate)	116	66-147		%REC	1.0	8015MOD	7/31/03	7/31/03 20:37	SMC	FUELS1_030731A
Benzene	77	2.5	D2	µg/L	5.0	SW8260B	N/A	7/30/03 18:12	JH	D30730A
Ethylbenzene	9.7	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 13:46	JH	D30730A
Methyl tert-butyl ether	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 13:46	JH	D30730A
Toluene	110	15	D2	µg/L	5.0	SW8260B	N/A	7/30/03 18:12	JH	D30730A
Xylenes, Total	40	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 13:46	JH	D30730A
4-Bromofluorobenzene(Surrogate)	89	75-108		%REC	1.0	SW8260B	N/A	7/30/03 13:46	JH	D30730A
Dibromofluoromethane(Surrogate)	103	71-109		%REC	1.0	SW8260B	N/A	7/30/03 13:46	JH	D30730A
1,2-Dichloroethane-d4(Surrogate)	103	64-119		%REC	1.0	SW8260B	N/A	7/30/03 13:46	JH	D30730A
Toluene-d8(Surrogate)	93	78-107		%REC	1.0	SW8260B	N/A	7/30/03 13:46	JH	D30730A



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Date Printed 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates
Work Order: 0307387
Lab ID: 0307387-28
Project Name: Speedy's Truckstop
Project Number: 337.12

Client Sample ID: WS-03
Collection Date: 7/23/2003 12:45:00 PM
Matrix: AQUEOUS

Analyte	Result	PQL	Qual	Units	DF	Test Code	Date Prepared	Date Analyzed	Analyst	Batch ID
C6-C10 GRO	<2.0	2.0		mg/L	1.0	8015MOD	7/31/03	7/31/03 21:27	SMC	FUELS1_030731A
C10-C22 DRO	<3.0	3.0		mg/L	1.0	8015MOD	7/31/03	7/31/03 21:27	SMC	FUELS1_030731A
C22-C32 ORO	<10	10		mg/L	1.0	8015MOD	7/31/03	7/31/03 21:27	SMC	FUELS1_030731A
o-Terphenyl(Surrogate)	118	66-147		%REC	1.0	8015MOD	7/31/03	7/31/03 21:27	SMC	FUELS1_030731A
Benzene	22	0.50		µg/L	1.0	SW8260B	N/A	7/30/03 14:24	JH	D30730A
Ethylbenzene	34	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 14:24	JH	D30730A
Methyl tert-butyl ether	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 14:24	JH	D30730A
Toluene	120	15	D2	µg/L	5.0	SW8260B	N/A	7/30/03 18:50	JH	D30730A
Xylenes, Total	49	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 14:24	JH	D30730A
4-Bromofluorobenzene(Surrogate)	89	75-108		%REC	1.0	SW8260B	N/A	7/30/03 14:24	JH	D30730A
Dibromofluoromethane(Surrogate)	102	71-109		%REC	1.0	SW8260B	N/A	7/30/03 14:24	JH	D30730A
1,2-Dichloroethane-d4(Surrogate)	102	64-119		%REC	1.0	SW8260B	N/A	7/30/03 14:24	JH	D30730A
Toluene-d8(Surrogate)	89	78-107		%REC	1.0	SW8260B	N/A	7/30/03 14:24	JH	D30730A



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License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates

Client Sample ID: WS-04

Work Order: 0307387

Collection Date: 7/23/2003 5:00:00 PM

Lab ID: 0307387-29

Matrix: AQUEOUS

Project Name: Speedy's Truckstop

Project Number: 337.12

Analyte	Result	PQL	Qual	Units	DF	Test Code	Date Prepared	Date Analyzed	Analyst	Batch ID
C6-C10 GRO	<2.0	2.0		mg/L	1.0	8015MOD	7/31/03	7/31/03 22:18	SMC	FUELS1_030731A
C10-C22 DRO	<3.0	3.0		mg/L	1.0	8015MOD	7/31/03	7/31/03 22:18	SMC	FUELS1_030731A
C22-C32 ORO	<10	10		mg/L	1.0	8015MOD	7/31/03	7/31/03 22:18	SMC	FUELS1_030731A
o-Terphenyl(Surrogate)	118	66-147		%REC	1.0	8015MOD	7/31/03	7/31/03 22:18	SMC	FUELS1_030731A
Benzene	<0.50	0.50		µg/L	1.0	SW8260B	N/A	7/30/03 15:02	JH	D30730A
Ethylbenzene	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 15:02	JH	D30730A
Methyl tert-butyl ether	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 15:02	JH	D30730A
Toluene	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 15:02	JH	D30730A
Xylenes, Total	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 15:02	JH	D30730A
4-Bromofluorobenzene(Surrogate)	89	75-108		%REC	1.0	SW8260B	N/A	7/30/03 15:02	JH	D30730A
Dibromofluoromethane(Surrogate)	101	71-109		%REC	1.0	SW8260B	N/A	7/30/03 15:02	JH	D30730A
1,2-Dichloroethane-d4(Surrogate)	100	64-119		%REC	1.0	SW8260B	N/A	7/30/03 15:02	JH	D30730A
Toluene-d8(Surrogate)	92	78-107		%REC	1.0	SW8260B	N/A	7/30/03 15:02	JH	D30730A



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CLIENT: Allen, Stephenson & Associates
Work Order: 0307387
Lab ID: 0307387-30
Project Name: Speedy's Truckstop
Project Number: 337.12

Client Sample ID: WS-05
Collection Date: 7/24/2003 11:30:00 AM
Matrix: AQUEOUS

Analyte	Result	PQL	Qual	Units	DF	Test Code	Date Prepared	Date Analyzed	Analyst	Batch ID
C6-C10 GRO	<2.0	2.0		mg/L	1.0	8015MOD	7/31/03	7/31/03 23:08	SMC	FUELS1_030731A
C10-C22 DRO	<3.0	3.0		mg/L	1.0	8015MOD	7/31/03	7/31/03 23:08	SMC	FUELS1_030731A
C22-C32 ORO	<10	10		mg/L	1.0	8015MOD	7/31/03	7/31/03 23:08	SMC	FUELS1_030731A
o-Terphenyl(Surrogate)	115	66-147		%REC	1.0	8015MOD	7/31/03	7/31/03 23:08	SMC	FUELS1_030731A
Benzene	1.1	0.50		µg/L	1.0	SW8260B	N/A	7/30/03 15:40	JH	D30730A
Ethylbenzene	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 15:40	JH	D30730A
Methyl tert-butyl ether	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 15:40	JH	D30730A
Toluene	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 15:40	JH	D30730A
Xylenes, Total	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 15:40	JH	D30730A
4-Bromofluorobenzene(Surrogate)	87	75-108		%REC	1.0	SW8260B	N/A	7/30/03 15:40	JH	D30730A
Dibromofluoromethane(Surrogate)	103	71-109		%REC	1.0	SW8260B	N/A	7/30/03 15:40	JH	D30730A
1,2-Dichloroethane-d4(Surrogate)	102	64-119		%REC	1.0	SW8260B	N/A	7/30/03 15:40	JH	D30730A
Toluene-d8(Surrogate)	94	78-107		%REC	1.0	SW8260B	N/A	7/30/03 15:40	JH	D30730A



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Date Printed 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates
Work Order: 0307387
Lab ID: 0307387-31
Project Name: Speedy's Truckstop
Project Number: 337.12

Client Sample ID: WS-06
Collection Date: 7/25/2003 1:10:00 PM
Matrix: AQUEOUS

Analyte	Result	PQL	Qual	Units	DF	Test Code	Date Prepared	Date Analyzed	Analyst	Batch ID
C6-C10 GRO	<2.0	2.0		mg/L	1.0	8015MOD	7/31/03	7/31/03 23:59	SMC	FUELS1_030731A
C10-C22 DRO	<3.0	3.0		mg/L	1.0	8015MOD	7/31/03	7/31/03 23:59	SMC	FUELS1_030731A
C22-C32 ORO	<10	10		mg/L	1.0	8015MOD	7/31/03	7/31/03 23:59	SMC	FUELS1_030731A
o-Terphenyl(Surrogate)	114	66-147		%REC	1.0	8015MOD	7/31/03	7/31/03 23:59	SMC	FUELS1_030731A
Benzene	3.3	0.50		µg/L	1.0	SW8260B	N/A	7/30/03 16:18	JH	D30730A
Ethylbenzene	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 16:18	JH	D30730A
Methyl tert-butyl ether	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 16:18	JH	D30730A
Toluene	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 16:18	JH	D30730A
Xylenes, Total	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 16:18	JH	D30730A
4-Bromofluorobenzene(Surrogate)	85	75-108		%REC	1.0	SW8260B	N/A	7/30/03 16:18	JH	D30730A
Dibromofluoromethane(Surrogate)	100	71-109		%REC	1.0	SW8260B	N/A	7/30/03 16:18	JH	D30730A
1,2-Dichloroethane-d4(Surrogate)	103	64-119		%REC	1.0	SW8260B	N/A	7/30/03 16:18	JH	D30730A
Toluene-d8(Surrogate)	92	78-107		%REC	1.0	SW8260B	N/A	7/30/03 16:18	JH	D30730A



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License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates

Client Sample ID: MW-2A

Work Order: 0307387

Collection Date: 7/25/2003 10:00:00 AM

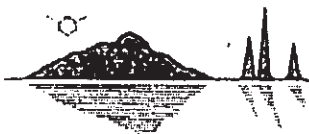
Lab ID: 0307387-32

Matrix: AQUEOUS

Project Name: Speedy's Truckstop

Project Number: 337.12

Analyte	Result	PQL	Qual	Units	DF	Test Code	Date Prepared	Date Analyzed	Analyst	Batch ID
C6-C10 GRO	43	2.0		mg/L	1.0	8015MOD	7/31/03	8/1/03 0:50	SMC	FUELS1_030731A
C10-C22 DRO	9.5	3.0		mg/L	1.0	8015MOD	7/31/03	8/1/03 0:50	SMC	FUELS1_030731A
C22-C32 ORO	<10	10		mg/L	1.0	8015MOD	7/31/03	8/1/03 0:50	SMC	FUELS1_030731A
o-Terphenyl(Surrogate)	113	66-147		%REC	1.0	8015MOD	7/31/03	8/1/03 0:50	SMC	FUELS1_030731A
Benzene	630	25	D2	µg/L	50	SW8260B	N/A	7/30/03 20:06	JH	D30730A
Ethylbenzene	360	100	D2	µg/L	50	SW8260B	N/A	7/30/03 20:06	JH	D30730A
Methyl tert-butyl ether	<10	10	D1	µg/L	5.0	SW8260B	N/A	7/31/03 13:55	JH	N30731A
Toluene	1500	150	D2	µg/L	50	SW8260B	N/A	7/30/03 20:06	JH	D30730A
Xylenes, Total	2100	150	D2	µg/L	50	SW8260B	N/A	7/30/03 20:06	JH	D30730A
4-Bromofluorobenzene(Surrogate)	93	75-108		%REC	5.0	SW8260B	N/A	7/31/03 13:55	JH	N30731A
Dibromofluoromethane(Surrogate)	89	71-109		%REC	5.0	SW8260B	N/A	7/31/03 13:55	JH	N30731A
1,2-Dichloroethane-d4(Surrogate)	89	64-119		%REC	5.0	SW8260B	N/A	7/31/03 13:55	JH	N30731A
Toluene-d8(Surrogate)	86	78-107		%REC	5.0	SW8260B	N/A	7/31/03 13:55	JH	N30731A



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License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates

Client Sample ID: MW-4

Work Order: 0307387

Collection Date: 7/24/2003 3:45:00 PM

Lab ID: 0307387-33

Matrix: AQUEOUS

Project Name: Speedy's Truckstop

Project Number: 337.12

Analyte	Result	PQL	Qual	Units	DF	Test Code	Date Prepared	Date Analyzed	Analyst	Batch ID
C6-C10 GRO	<2.0	2.0		mg/L	1.0	8015MOD	7/31/03	8/1/03 3:21	SMC	FUELS1_030731A
C10-C22 DRO	<3.0	3.0		mg/L	1.0	8015MOD	7/31/03	8/1/03 3:21	SMC	FUELS1_030731A
C22-C32 ORO	<10	10		mg/L	1.0	8015MOD	7/31/03	8/1/03 3:21	SMC	FUELS1_030731A
o-Terphenyl(Surrogate)	111	66-147		%REC	1.0	8015MOD	7/31/03	8/1/03 3:21	SMC	FUELS1_030731A
Benzene	1.9	0.50		µg/L	1.0	SW8260B	N/A	7/30/03 16:56	JH	D30730A
Ethylbenzene	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 16:56	JH	D30730A
Methyl tert-butyl ether	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 16:56	JH	D30730A
Toluene	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 16:56	JH	D30730A
Xylenes, Total	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 16:56	JH	D30730A
4-Bromofluorobenzene(Surrogate)	88	75-108		%REC	1.0	SW8260B	N/A	7/30/03 16:56	JH	D30730A
Dibromofluoromethane(Surrogate)	100	71-109		%REC	1.0	SW8260B	N/A	7/30/03 16:56	JH	D30730A
1,2-Dichloroethane-d4(Surrogate)	102	64-119		%REC	1.0	SW8260B	N/A	7/30/03 16:56	JH	D30730A
Toluene-d8(Surrogate)	92	78-107		%REC	1.0	SW8260B	N/A	7/30/03 16:56	JH	D30730A



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Date Printed 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates

Work Order: 0307387

Lab ID: 0307387-34

Project Name: Speedy's Truckstop

Project Number: 337.12

Client Sample ID: MW-8

Collection Date: 7/24/2003 5:20:00 PM

Matrix: AQUEOUS

Analyte	Result	PQL	Qual	Units	DF	Test Code	Date Prepared	Date Analyzed	Analyst	Batch ID
C6-C10 GRO	<2.0	2.0		mg/L	1.0	8015MOD	7/31/03	8/1/03 5:52	SMC	FUELS1_030731A
C10-C22 DRO	<3.0	3.0		mg/L	1.0	8015MOD	7/31/03	8/1/03 5:52	SMC	FUELS1_030731A
C22-C32 ORO	<10	10		mg/L	1.0	8015MOD	7/31/03	8/1/03 5:52	SMC	FUELS1_030731A
o-Terphenyl(Surrogate)	116	66-147		%REC	1.0	8015MOD	7/31/03	8/1/03 5:52	SMC	FUELS1_030731A
Benzene	6.0	0.50		µg/L	1.0	SW8260B	N/A	7/30/03 17:34	JH	D30730A
Ethylbenzene	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 17:34	JH	D30730A
Methyl tert-butyl ether	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 17:34	JH	D30730A
Toluene	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 17:34	JH	D30730A
Xylenes, Total	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 17:34	JH	D30730A
4-Bromofluorobenzene(Surrogate)	84	75-108		%REC	1.0	SW8260B	N/A	7/30/03 17:34	JH	D30730A
Dibromofluoromethane(Surrogate)	106	71-109		%REC	1.0	SW8260B	N/A	7/30/03 17:34	JH	D30730A
1,2-Dichloroethane-d4(Surrogate)	108	64-119		%REC	1.0	SW8260B	N/A	7/30/03 17:34	JH	D30730A
Toluene-d8(Surrogate)	97	78-107		%REC	1.0	SW8260B	N/A	7/30/03 17:34	JH	D30730A



**TRANSWEST
GEOCHEM**

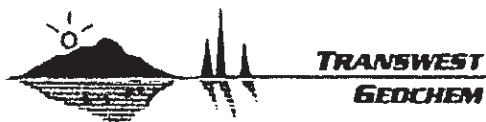
Date Printed 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates
Work Order: 0307387
Lab ID: 0307387-35
Project Name: Speedy's Truckstop
Project Number: 337.12

Client Sample ID: Trip Blank
Collection Date: 7/22/2003 2:30:00 PM
Matrix: TRIP BLANK

Analyte	Result	PQL	Qual	Units	DF	Test Code	Date Prepared	Date Analyzed	Analyst	Batch ID
Benzene	<0.50	0.50		µg/L	1.0	SW8260B	N/A	7/30/03 19:28	JH	D30730A
Ethylbenzene	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 19:28	JH	D30730A
Methyl tert-butyl ether	<2.0	2.0		µg/L	1.0	SW8260B	N/A	7/30/03 19:28	JH	D30730A
Toluene	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 19:28	JH	D30730A
Xylenes, Total	<3.0	3.0		µg/L	1.0	SW8260B	N/A	7/30/03 19:28	JH	D30730A
4-Bromofluorobenzene(Surrogate)	86	75-108		%REC	1.0	SW8260B	N/A	7/30/03 19:28	JH	D30730A
Dibromofluoromethane(Surrogate)	108	71-109		%REC	1.0	SW8260B	N/A	7/30/03 19:28	JH	D30730A
1,2-Dichloroethane-d4(Surrogate)	113	64-119		%REC	1.0	SW8260B	N/A	7/30/03 19:28	JH	D30730A
Toluene-d8(Surrogate)	91	78-107		%REC	1.0	SW8260B	N/A	7/30/03 19:28	JH	D30730A



Date: 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates
Work Order: 0307387
Project: Speedy's Truckstop/337.12

QC SUMMARY REPORT

Method Blank

Analyte	Result	PQL	Qual	Units	DF	Test Code	Date Prepared	Date Analyzed	Analyst	Batch ID
C6-C10 GRO	<2.0	2.0		mg/L	1	8015MOD	7/31/03	7/31/03 17:14	SMC	FUELS1_030731A
C10-C22 DRO	<3.0	3.0		mg/L	1	8015MOD	7/31/03	7/31/03 17:14	SMC	FUELS1_030731A
C22-C32 ORO	<10	10		mg/L	1	8015MOD	7/31/03	7/31/03 17:14	SMC	FUELS1_030731A
o-Terphenyl	115	66-147		%REC	1	8015MOD	7/31/03	7/31/03 17:14	SMC	FUELS1_030731A
Benzene	<0.50	0.50		µg/L	1	SW8260B	N/A	7/30/03 12:08	JH	D30730A
Chlorobenzene	<0.50	0.50		µg/L	1	SW8260B	N/A	7/30/03 12:08	JH	D30730A
1,1-Dichloroethene	<0.50	0.50		µg/L	1	SW8260B	N/A	7/30/03 12:08	JH	D30730A
Ethylbenzene	<2.0	2.0		µg/L	1	SW8260B	N/A	7/30/03 12:08	JH	D30730A
Methyl tert-butyl ether	<2.0	2.0		µg/L	1	SW8260B	N/A	7/30/03 12:08	JH	D30730A
Toluene	<3.0	3.0		µg/L	1	SW8260B	N/A	7/30/03 12:08	JH	D30730A
Trichloroethene	<0.50	0.50		µg/L	1	SW8260B	N/A	7/30/03 12:08	JH	D30730A
Xylenes, Total	<3.0	3.0		µg/L	1	SW8260B	N/A	7/30/03 12:08	JH	D30730A
4-Bromofluorobenzene	92	75-108		%REC	1	SW8260B	N/A	7/30/03 12:08	JH	D30730A
Dibromofluoromethane	100	71-109		%REC	1	SW8260B	N/A	7/30/03 12:08	JH	D30730A
1,2-Dichloroethane-d4	100	64-119		%REC	1	SW8260B	N/A	7/30/03 12:08	JH	D30730A
Toluene-d8	92	78-107		%REC	1	SW8260B	N/A	7/30/03 12:08	JH	D30730A



TRANSWEST
GEOCHEM

Date: 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates
Work Order: 0307387
Project: Speedy's Truckstop/337.12

QC SUMMARY REPORT

Method Blank

Analyte	Result	PQL	Qual	Units	DF	Test Code	Date Prepared	Date Analyzed	Analyst	Batch ID
Acetone	<20	20		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Benzene	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Bromobenzene	<1.5	1.5		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Bromochloromethane	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Bromodichloromethane	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Bromoform	<1.0	1.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Bromomethane	<5.0	5.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
2-Butanone	<5.0	5.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
n-Butylbenzene	<2.5	2.5		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
sec-Butylbenzene	<1.5	1.5		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
tert-Butylbenzene	<2.5	2.5		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Carbon tetrachloride	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Chlorobenzene	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Chloroethane	<5.0	5.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Chloroform	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Chloromethane	<5.0	5.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
2-Chlorotoluene	<1.5	1.5		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
4-Chlorotoluene	<2.0	2.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Dibromochloromethane	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,2-Dibromoethane	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,2-Dichlorobenzene	<1.5	1.5		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,3-Dichlorobenzene	<1.5	1.5		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,4-Dichlorobenzene	<1.5	1.5		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Dichlorodifluoromethane	<2.0	2.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,1-Dichloroethane	<1.0	1.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,2-Dichloroethane	<1.0	1.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,1-Dichloroethene	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
cis-1,2-Dichloroethene	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
trans-1,2-Dichloroethene	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,2-Dichloropropane	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,3-Dichloropropane	<1.0	1.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
2,2-Dichloropropane	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,1-Dichloropropene	<1.0	1.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
cis-1,3-Dichloropropene	<1.0	1.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
trans-1,3-Dichloropropene	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Ethylbenzene	<2.0	2.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
2-Hexanone	<5.0	5.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
4-Isopropyltoluene	<1.5	1.5		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Methyl tert-butyl ether	<2.0	2.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
4-Methyl-2-pentanone	<5.0	5.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Methylene chloride	<3.0	3.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
n-Propylbenzene	<2.0	2.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Styrene	<1.0	1.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,1,2,2-Tetrachloroethane	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Tetrachloroethene	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A



TRANSWEST
GEDCHEM

Date: 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates
Work Order: 0307387
Project: Speedy's Truckstop/337.12

QC SUMMARY REPORT

Method Blank

Analyte	Result	PQL	Qual	Units	DF	Test Code	Date Prepared	Date Analyzed	Analyst	Batch ID
Toluene	<3.0	3.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,2,3-Trichlorobenzene-	<5.0	5.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,1,1-Trichloroethane	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,1,2-Trichloroethane	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Trichloroethene	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Trichlorofluoromethane	<2.0	2.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,2,3-Trichloropropane	<1.0	1.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,2,4-Trimethylbenzene	<2.0	2.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,3,5-Trimethylbenzene	<1.5	1.5		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Vinyl acetate	<5.0	5.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Vinyl chloride	<0.50	0.50		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Xylenes, Total	<3.0	3.0		µg/L	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
4-Bromofluorobenzene	93	75-108		%REC	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Dibromofluoromethane	88	71-109		%REC	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
1,2-Dichloroethane-d4	89	64-119		%REC	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A
Toluene-d8	88	78-107		%REC	1	SW8260B	N/A	7/31/03 12:17	JH	N30731A



TRANSWEST
GEOCHEM

Date: 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates

Work Order: 0307387

Project: Speedy's Truckstop/337.12

QC SUMMARY REPORT

Sample Matrix Spike

Analyte	Result	PQL	SPK value	SPK Ref Val	% Rec	Low Limit	High Limit	RPD Ref Val	% RPD	RPD Limit	Qual
Sample ID: 0307387-33B-MS Batch ID: FUELS1_030731A Test Code: 8015MOD Date Analyzed: 08/01/03 04:11											
Client ID: MW-4 Units: mg/L Date Prepared: 7/31/03											
C10-C22 DRO	63.1	3.0	50.0	<3.0	126%	82	158				
o-Terphenyl	1.09	N/A	1.00	N/A	109%	66	147				
Sample ID: 0307387-33B-MSD Batch ID: FUELS1_030731A Test Code: 8015MOD Date Analyzed: 08/01/03 05:02											
Client ID: MW-4 Units: mg/L Date Prepared: 7/31/03											
C10-C22 DRO	60.9	3.0	50.0	<3.0	122%	82	158	63.1	4%	8	
o-Terphenyl	1.06	N/A	1.00	N/A	106%	66	147				
Sample ID: 0307387-30AS Batch ID: D30730A Test Code: SW8260B Date Analyzed: 07/30/03 20:44											
Client ID: WS-05 Units: µg/L Date Prepared: N/A											
Benzene	21.35	0.50	20.00	1.140	101%	76	131				
Chlorobenzene	18.00	0.50	20.00	<0.50	90%	70	118				
1,1-Dichloroethene	25.48	0.50	20.00	<0.50	127%	70	155				
Toluene	22.44	3.0	20.00	<3.0	112%	67	128				
Trichloroethene	19.95	0.50	20.00	<0.50	100%	66	129				
4-Bromofluorobenzene	44.94	N/A	50.00	N/A	90%	75	108				
Dibromofluoromethane	53.02	N/A	50.00	N/A	106%	71	109				
1,2-Dichloroethane-d4	54.86	N/A	50.00	N/A	110%	64	119				
Toluene-d8	45.03	N/A	50.00	N/A	90%	78	107				
Sample ID: 0307387-30ASD Batch ID: D30730A Test Code: SW8260B Date Analyzed: 07/30/03 21:22											
Client ID: WS-05 Units: µg/L Date Prepared: N/A											
Benzene	21.23	0.50	20.00	1.140	100%	76	131	21.35	1%	34	
Chlorobenzene	17.99	0.50	20.00	<0.50	90%	70	118	18.00	0%	32	
1,1-Dichloroethene	25.47	0.50	20.00	<0.50	127%	70	155	25.48	0%	37	
Toluene	22.26	3.0	20.00	<3.0	111%	67	128	22.44	1%	34	
Trichloroethene	20.45	0.50	20.00	<0.50	102%	66	129	19.95	2%	36	
4-Bromofluorobenzene	45.39	N/A	50.00	N/A	91%	75	108				
Dibromofluoromethane	52.62	N/A	50.00	N/A	105%	71	109				
1,2-Dichloroethane-d4	52.79	N/A	50.00	N/A	106%	64	119				
Toluene-d8	45.37	N/A	50.00	N/A	91%	78	107				



TRANSWEST
GEOCHEM

Date: 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates
Work Order: 0307387
Project: Speedy's Truckstop/337.12

QC SUMMARY REPORT

Sample Matrix Spike

Analyte	Result	PQL	SPK value	SPK Ref Val	% Rec	Low Limit	High Limit	RPD Ref Val	% RPD	RPD Limit	Qual
Sample ID: 0307387-26AS		Batch ID: N30731A		Test Code: SW8260B		Date Analyzed: 07/31/03 14:34					
Client ID: WS-01A				Units: µg/L		Date Prepared: N/A					
Benzene	22.83	0.50	20.00	<0.50	114%	76	131				
Chlorobenzene	21.14	0.50	20.00	<0.50	106%	70	118				
1,1-Dichloroethene	26.42	0.50	20.00	<0.50	132%	70	155				
Toluene	21.48	3.0	20.00	<3.0	107%	67	128				
Trichloroethene	22.07	0.50	20.00	<0.50	110%	66	129				
4-Bromofluorobenzene	46.47	N/A	50.00	N/A	93%	75	108				
Dibromofluoromethane	42.45	N/A	50.00	N/A	85%	71	109				
1,2-Dichloroethane-d4	42.12	N/A	50.00	N/A	84%	64	119				
Toluene-d8	42.66	N/A	50.00	N/A	85%	78	107				
Sample ID: 0307387-26ASD		Batch ID: N30731A		Test Code: SW8260B		Date Analyzed: 07/31/03 15:13					
Client ID: WS-01A				Units: µg/L		Date Prepared: N/A					
Benzene	22.52	0.50	20.00	<0.50	113%	76	131	22.83	1%	34	
Chlorobenzene	20.91	0.50	20.00	<0.50	105%	70	118	21.14	1%	32	
1,1-Dichloroethene	25.89	0.50	20.00	<0.50	129%	70	155	26.42	2%	37	
Toluene	21.15	3.0	20.00	<3.0	106%	67	128	21.48	2%	34	
Trichloroethene	22.16	0.50	20.00	<0.50	111%	66	129	22.07	0%	36	
4-Bromofluorobenzene	46.78	N/A	50.00	N/A	94%	75	108				
Dibromofluoromethane	42.01	N/A	50.00	N/A	84%	71	109				
1,2-Dichloroethane-d4	41.10	N/A	50.00	N/A	82%	64	119				
Toluene-d8	41.97	N/A	50.00	N/A	84%	78	107				



**TRANSWEST
GEOCHEM**

Date: 04-Aug-03
License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates
Work Order: 0307387
Project: Speedy's Truckstop/337.12

QC SUMMARY REPORT
Blank Spike

Analyte	Result	PQL	SPK value	SPK Ref Val	% Rec	Low Limit	High Limit	RPD Ref Val	% RPD	RPD Limit	Qual
Sample ID: LCS AQ 7/31		Batch ID: FUELS1_030731A		Test Code: 8015MOD		Date Analyzed: 07/31/03 18:05		Units: mg/L		Date Prepared: 7/31/03	
C10-C22 DRO	64.5	3.0	50.0	<3.0	129%	87	147				
o-Terphenyl	1.08	N/A	1.00	N/A	108%	66	147				



**TRANSWEST
GEOCHEM**

Date: 04-Aug-03

License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates
Work Order: 0307387
Project: Speedy's Truckstop/337.12

QC SUMMARY REPORT

Secondary Source Blank Spike

Analyte	Result	PQL	SPK value	SPK Ref Val	% Rec	Low Limit	High Limit	RPD Ref Val	% RPD	RPD Limit	Qual
Sample ID: LCSV-D30730A			Batch ID: D30730A			Test Code: SW8260B			Date Analyzed: 07/30/03 10:51		
						Units: µg/L			Date Prepared: N/A		
Benzene	20.38	0.50	20.00	<0.50	102%	87	121				
Chlorobenzene	18.72	0.50	20.00	<0.50	94%	83	111				
1,1-Dichloroethene	22.98	0.50	20.00	<0.50	115%	75	140				
Toluene	21.99	3.0	20.00	<3.0	110%	83	117				
Trichloroethene	20.32	0.50	20.00	<0.50	102%	75	119				
4-Bromofluorobenzene	46.32	N/A	50.00	N/A	93%	75	108				
Dibromofluoromethane	50.92	N/A	50.00	N/A	102%	71	109				
1,2-Dichloroethane-d4	49.24	N/A	50.00	N/A	98%	64	119				
Toluene-d8	44.74	N/A	50.00	N/A	89%	78	107				
Sample ID: LCSVD-D30730A			Batch ID: D30730A			Test Code: SW8260B			Date Analyzed: 07/30/03 11:30		
						Units: µg/L			Date Prepared: N/A		
Benzene	20.32	0.50	20.00	<0.50	102%	87	121	20.38	0%	18	
Chlorobenzene	18.89	0.50	20.00	<0.50	94%	83	111	18.72	1%	13	
1,1-Dichloroethene	22.59	0.50	20.00	<0.50	113%	75	140	22.98	2%	21	
Toluene	21.76	3.0	20.00	<3.0	109%	83	117	21.99	1%	18	
Trichloroethene	20.37	0.50	20.00	<0.50	102%	75	119	20.32	0%	20	
4-Bromofluorobenzene	45.64	N/A	50.00	N/A	91%	75	108				
Dibromofluoromethane	50.84	N/A	50.00	N/A	102%	71	109				
1,2-Dichloroethane-d4	49.83	N/A	50.00	N/A	100%	64	119				
Toluene-d8	46.03	N/A	50.00	N/A	92%	78	107				
Sample ID: LCSV-N30731A			Batch ID: N30731A			Test Code: SW8260B			Date Analyzed: 07/31/03 11:00		
						Units: µg/L			Date Prepared: N/A		
Benzene	20.99	0.50	20.00	<0.50	105%	87	121				
Chlorobenzene	19.86	0.50	20.00	<0.50	99%	83	111				
1,1-Dichloroethene	22.80	0.50	20.00	<0.50	114%	75	140				
Toluene	19.88	3.0	20.00	<3.0	99%	83	117				
Trichloroethene	20.24	0.50	20.00	<0.50	101%	75	119				
4-Bromofluorobenzene	46.89	N/A	50.00	N/A	94%	75	108				
Dibromofluoromethane	43.43	N/A	50.00	N/A	87%	71	109				
1,2-Dichloroethane-d4	41.85	N/A	50.00	N/A	84%	64	119				
Toluene-d8	42.32	N/A	50.00	N/A	85%	78	107				



TRANSWEST
GEOCHEM

Date: 04-Aug-03
License No. AZM133/AZ0133

CLIENT: Allen, Stephenson & Associates
Work Order: 0307387
Project: Speedy's Truckstop/337.12

QC SUMMARY REPORT
Secondary Source Blank Spike Duplicate

Analyte	Result	PQL	SPK value	SPK Ref Val	% Rec	Low Limit	High Limit	RPD Ref Val	% RPD	RPD Limit	Qual
Sample ID: LCSVD-N30731A		Batch ID: N30731A		Test Code: SW8260B		Date Analyzed: 07/31/03 11:38					
				Units: µg/L		Date Prepared: N/A					
Benzene	21.58	0.50	20.00	<0.50	108%	87	121	20.99	3%	18	
Chlorobenzene	20.25	0.50	20.00	<0.50	101%	83	111	19.86	2%	13	
1,1-Dichloroethene	23.60	0.50	20.00	<0.50	118%	75	140	22.80	3%	21	
Toluene	20.54	3.0	20.00	<3.0	103%	83	117	19.88	3%	18	
Trichloroethene	20.49	0.50	20.00	<0.50	102%	75	119	20.24	1%	20	
4-Bromofluorobenzene	47.03	N/A	50.00	N/A	94%	75	108				
Dibromofluoromethane	43.48	N/A	50.00	N/A	87%	71	109				
1,2-Dichloroethane-d4	41.43	N/A	50.00	N/A	83%	64	119				
Toluene-d8	42.63	N/A	50.00	N/A	85%	78	107				



TRANSWEST GEOCHEM

3725 East Atlanta Avenue, Suite 2
Phoenix, Arizona 85040
Phone: (602) 437-0330
Fax: (602) 437-0660

Chain of Custody 387
TGI Work Order No: 0307387
Date 7/26/03 Page 1 of 3

Project Manager:	Dino Gotsis
Client Name:	Allen Stephenson Associates
Address:	1130 E 9th Missouri Ave, Suite 110
City/State/Zip:	Phoenix, AZ 85014
Phone:	602-263-9522
Fax:	602-263-7765

Bill to:	Same
Company:	
Address:	
City/State/Zip:	
Phone:	
Fax:	

P.O. No.:			
Project Name:	Spandys' Truck Stop		
Project Number:	337.12		
SAMPLE RECEIPT			
Temperature:	50°F	Ambient:	Cold
Received/Intact:	Y	Freeze:	Absent / Freeze
Custody/Seals:	N	Color:	White / Blue
Total No. of Containers:	12		
Sample Identification	Matrix	Date Sampled	Time Sampled

ANALYSIS REQUEST			
No. of Containers	TPH, (418.1 / 418.1A2)	TPH, 8015A2R.1	BTEX (8021B)
Volatile Organics GCMS (624/8260A2)	SDWA Volatiles, (524.2)	Semi-Volatile Organics GCMS (625/8270)	Organochlorine Pesticides (608/8081)
PCB's, (8082)	PAH, EPA 8310	8 RCRA Metals	13 Priority Pollutant Metals
WS-03-13	Soil	7/23/03	0830
WS-03-40		7/23/03	1145
WS-04-10		7/24/03	1500
WS-04-15		7/24/03	1507
WS-04-20		7/24/03	1512
WS-04-25		7/24/03	1525
WS-04-30		7/24/03	1535
WS-04-35		7/24/03	1545
WS-04-40		7/24/03	1553
WS-05-10		7/24/03	0938
WS-05-15		7/24/03	0950
WS-05-20		7/24/03	1010

Relinquished by: (Signature)	Steve Sutherland	Date/Time	7/26/03 0900
Received by: (Signature)	Blk Kivallu	Date/Time	7/26/03 0900
Relinquished by: (Signature)	Blk Kivallu	Date/Time	7/26/03 0900
Received by: (Signature)	Blk Kivallu	Date/Time	7/26/03 0900



3725 East Atlanta Avenue, Suite 2
Phoenix, Arizona 85040
Phone: (602) 437-0330
Fax: (602) 437-0660

Chain of Custody

TGI Work Order No: 0507386

Date 7/25/03 Page 2 of 3

Project Manager:	ASA
Client Name:	
Address:	
City, State, ZIP:	
Phone:	Fax:

Bill to:	
Company:	
Address:	
City/State/ZIP:	
Phone:	
Fax:	

P.O. No.	Project Name	Project Number	ANALYSIS REQUEST										Comments	
WS-05-25	Speedy's Truck Stop													
WS-05-30														
WS-05-40														
WS-06-03														
WS-06-06														
WS-06-09														
WS-06-12														
WS-06-15														
WS-06-20														
WS-06-25														
WS-06-30														
WS-06-35														

Relinquished by (Signature)	(Print Name)	Date/Time	Received by (Signature)	(Print Name)	Date/Time
SS S.H.	Stan Sutherland	7/26/90	Beth Krum	Beth Krum	7/26/90
			Jill	Stetson	7/26/90



3725 East Atlanta Avenue, Suite 2
Phoenix, Arizona 85040
Phone: (602) 437-0330
Fax: (602) 437-0660

Chain of Custody

TGI Work Order No: 030738

Date 7/26/03 Page 3 of 3

Project Manager:	ASA
Client Name:	
Address:	
City/State/ZIP:	
Phone:	
Fax:	

Bill to:	
Company:	
Address:	
City/State/ZIP:	
Phone:	
Fax:	

ANALYSIS REQUEST

P.O. No.:	
Project Name:	Special Trucks
Project Number:	
SAMPLE RECEIPT	
Temperature:	28°
Received/Intact:	X
Custody/Seals:	17
Total No. of Containers:	1
Sample Identification:	WIS-06-40
Matrix:	Soil
Date Sampled:	7/26/03
Time Sampled:	1135
Lab ID:	25
No. of Containers	
TPH: (418.1 / 418.1A2)	
TPH: (418.1 / 418.1A2)	
BTEX (8021B)	
Volatile Organics GCMS (624/8260A2)	
SDWA Volatiles, (524.2)	
Semi-Volatile Organics GCMS (625/8270)	
Organochlorine Pesticides (608/8081)	
PCB's, (8082)	
PAH, EPA 8310	
8 RCRA Metals	
13 Priority Pollutant Metals	
Comments	
extended hold	

Relinquished by: (Signature)	Steve S. Adelman	Date/Time	7/26/03
Received by: (Signature)	Alvin Kraybill	Date/Time	7/26/03
Relinquished by: (Signature)	Steve S. Adelman	Date/Time	7/26/03
Received by: (Signature)	Alvin Kraybill	Date/Time	7/26/03




3725 East Atlanta Avenue, Suite 2
Phoenix, Arizona 85040
Phone: (602) 437-0330
Fax: (602) 437-0660

Chain of Custody

TGI Work Order No: 0307381

Date 7/29/03 Page 1 of 1

Project Manager:	Jim Gotz	
Client Name:	Allen, Jackson & Associates	
Address:	1130 East Missouri Ave. Suite 110	
City/State/ZIP:	Phoenix, AZ 85014	
Phone:	602-263-7522	602-263-7655
		 Fax

Bill to:	Same
Company:	
Address:	
City, State, ZIP:	
Phone:	
	<input checked="" type="checkbox"/> Fax:

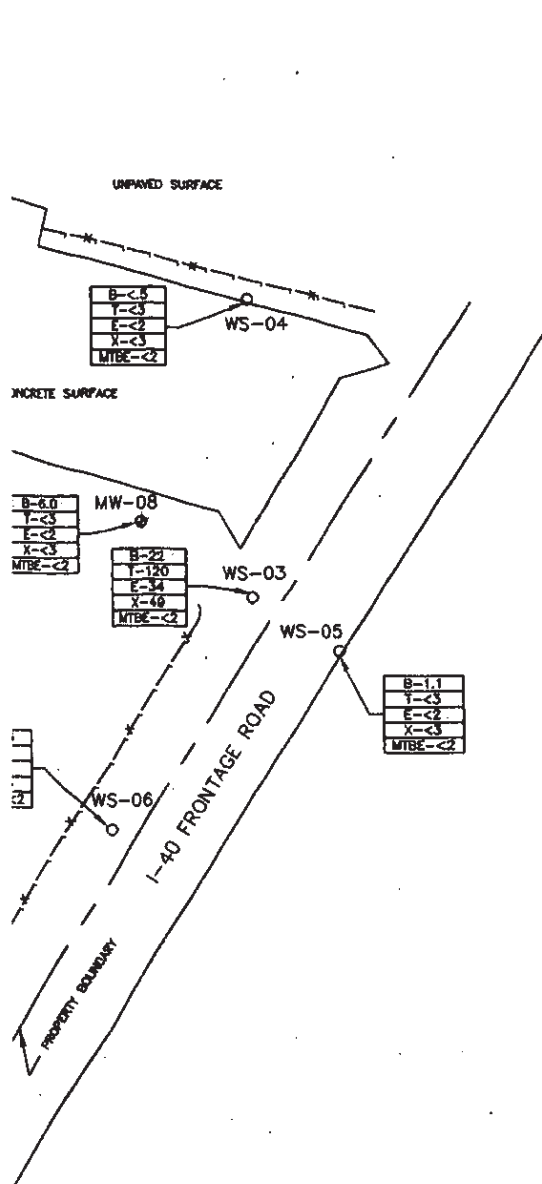
[illegible]

Relinquished by: (Signature)	(Print Name)	Date/Time	Received by: (Signature)	(Print Name)	Date/Time
	Steve S. Howard	7/6/03, 1710		Steve Haden	08/13/10

Speedy's Truck Stop
Multimedia Meeting
April 8, 2004
3:00 - 4:30 PM
Regional Response Center, 8th Floor

Agenda

- | | | |
|---|------------|--|
| 1. Introductions | 5 min | |
| 2. Overview of the site, including powerpoint photos | 10 minutes | Michele Rogow |
| 3. Round Table Discussion | 5 min each | Air, Water, Waste,
Superfund Programs |
| Each Division will provide: | | |
| - a status of any current activities or actions at the site | | |
| - authority at the site | | |
| 4. Overview of the Draft Order and Press Release | 10 min | ORC |
| 5. Plan for multimedia inspection of the site | 15 min | Everyone |
| - which programs have a role | | |
| - discussion of how to perform the inspection | | |
| - coordination with NN EPA | | |
| - coordination with AZ DEQ | | |
| 6. Review action items/next steps/leads | 10 min | Pam Overman |



SCALE: 1" = 70'



LEGEND

B-2.5
T-120
E-34
X-49
MTBE-2.5

BENZENE, TOLUENE, ETHYLBENZENE, TOTAL XYLENE & METHYL TERT-BUTYL ETHER GROUNDWATER ANALYTICAL LABORATORY RESULT (IN ug/L). YELLOW DENOTES THAT ANALYTE WAS DETECTED ABOVE MAXIMUM CONTAINMENT LEVEL. SAMPLE ANALYSIS BASED ON EPA METHOD 8260B.

<2

ANALYTE DETECTED BELOW LABORATORY REPORTING LIMIT



GROUNDWATER MONITORING WELL LOCATION AND IDENTIFICATION



ABANDONED GROUNDWATER MONITORING WELL LOCATION



HYDROPUNCH GROUNDWATER SAMPLING LOCATION (DRILLED & SAMPLED JULY 2003)

UST

UNDERGROUND STORAGE TANK

AST

ABOVE GROUND STORAGE TANK



PROPERTY BOUNDARY



FENCE



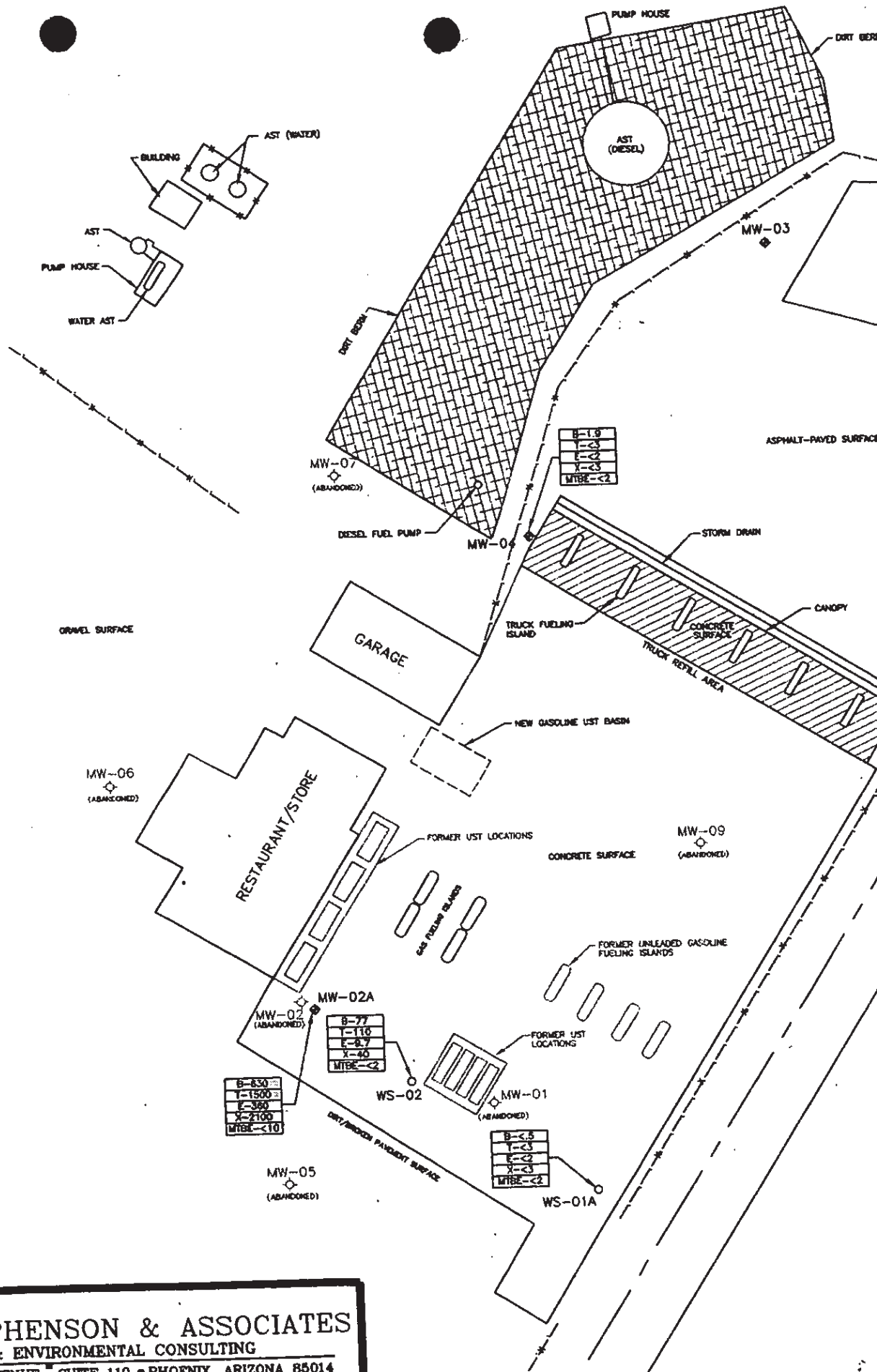
AREA ENCLOSED BY DIRT CONTAINMENT BERM

NOTE: THIS DRAWING ADAPTED FROM DELTA DRAWING NAME: FIGURE 1 DATED: FEB. 11, 1997

MONITOR WELL AND HYDROPUNCH
GROUNDWATER ANALYTICAL LABORATORY RESULTS
(JULY 22, 23 & 24, 2003)
BEACON TRUCK STOP #652
EXIT 359, GRANT ROAD AND I-40
LUPTON, ARIZONA

FIGURE

4



ALLEN, STEPHENSON & ASSOCIATES
 HYDROLOGIC & ENVIRONMENTAL CONSULTING
 1130 EAST MISSOURI AVENUE SUITE 110 • PHOENIX, ARIZONA 85014



BURGESS & NIPLE

Mr. Mark Nicholson
920 E. Highway 66
Gallup, NM 87301

Re Former Beacon Truck Stop 12652
Lupton, Arizona
WST-8, Site NAV-001

March 17, 2005

Burgess & Niple, Inc.

5025 East Washington Street
Suite 212
Phoenix, AZ 85034
602 244.8100
Fax 602 244.1915

Dear Mr. Nicholson:

Burgess & Niple (B&N) has been retained by Ultramar, Inc. to provide environmental consulting services at the referenced site. These services are being completed in response to the Environmental Protection Agency's (EPA) request to continue monitoring groundwater impacts in the vicinity of the former underground storage tanks (USTs) located adjacent the structure currently occupied by the restaurant.

B&N field activities will consist of installation five monitor/treatment wells within and adjacent to the former UST pit. The proposed monitor/treatment well locations are shown on the enclosed figure. B&N will coordinate with the facility manager and make every attempt to minimize the disruption to the onsite business operations. The proposed scope of work is scheduled for the week of March 28, 2005.

Should you have any questions regarding the proposed scope of services, please contact Mr. Robert Fishburn, Ultramar's Senior Project Manager at (559) 583-3251 or me at (602) 244-8100.

Sincerely,

Dino Gotsis
Project Manager

cc Robert Fishburn, Ultramar
~~Walt Guggenheimer, EPA Region 9,~~
Henry Haven, Navajo Nation EPA

Enclosure



SCALE: 1" = 70'

0 70 140 210

LEGEND

- MW-08 GROUNDWATER MONITORING WELL LOCATION AND IDENTIFICATION
- MW-01 ABANDONED GROUNDWATER MONITORING WELL LOCATION
- WS-03 HYDROPUNCH GROUNDWATER SAMPLING LOCATION (DRILLED & SAMPLED JULY 2003)
- WS-05 UST
- WS-06 ABOVE GROUND STORAGE TANK
- WS-07 PROPERTY BOUNDARY
- WS-08 FENCE
- WS-09 AREA ENCLOSED BY DIRT CONTAINMENT BERM

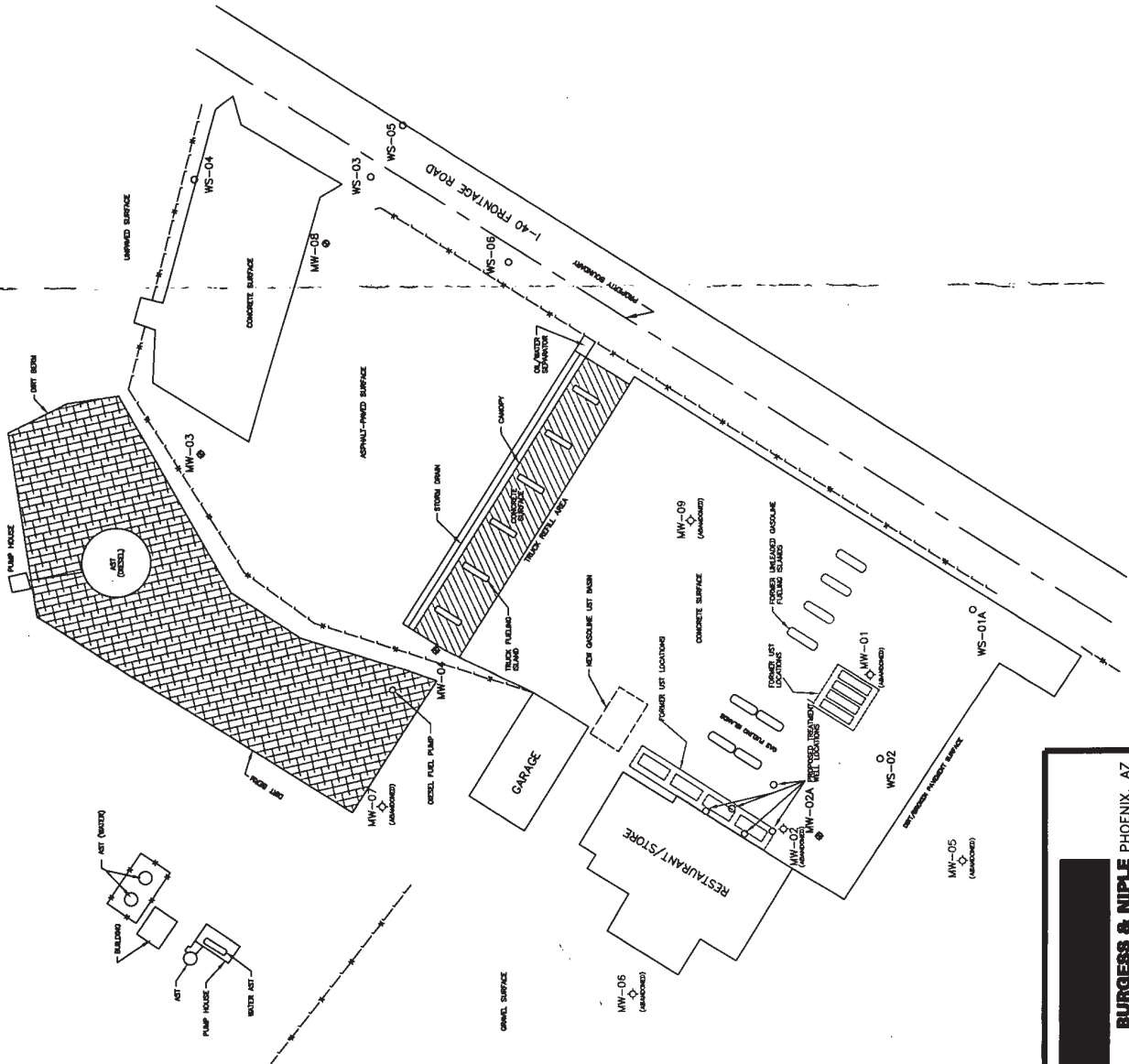
NOTE: THIS DRAWING ADAPTED FROM DELTA DRAWING NAME: FIGURE 1 DATED: FEB. 11, 1997

FIGURE

1

PROPOSED LOCATION OF MONITOR/TREATMENT WELLS
BEACON TRUCK STOP #652
EXIT 359, GRANT ROAD AND I-40
LUPTON, ARIZONA

BURGESS & NIPLE PHOENIX, AZ




BURGESS & NIPLE

Mr. Walt Guggenheimer
Underground Storage Tank Programs Office
United States Environmental Protection Agency
75 Hawthorne Street (WST-8)
San Francisco, CA 94105

Re Former Beacon Truck Stop #652
#NAV-001L

July 28, 2004

Burgess & Niple, Inc.

5025 East Washington Street
Suite 212
Phoenix, AZ 85034
602 244.8100
Fax 602 244.1915

Dear Mr. Guggenheimer:

Ultramar, Inc. (Ultramar) has retained Burgess & Niple (B&N) to provide environmental consulting support associated with the referenced leaking underground storage tank (LUST) case file. The latest correspondence between B&N and the Environmental Protection Agency (EPA; April 29, 2004) addressed several items concerning the LUST case file. One of the items, which B&N briefly addressed in the correspondence, pertained to EPA's request to implement enhanced bioremediation treatment in the vicinity of monitor well MW-02a. B&N agrees that the source of the petroleum hydrocarbons should be addressed; however, utilizing MW-02a a single source treatment well would not be sufficient to address the former UST pit petroleum hydrocarbon source area. Consequently, B&N provides the following treatment option to address the source area petroleum hydrocarbon impact.

Enhanced bioremediation technologies have been implemented at petroleum hydrocarbon impacted sites for years. Enhanced bioremediation technologies having remedial success consist of nutrient augmentation, oxygen stimulation and chemical oxidation or a consortium of all of the technologies. Many factors need to be considered when evaluating a remedial technology. The primary factor limiting the effectiveness of any remedial technology (whether it be conventional extraction techniques, pump and treat, biostimulation, etc.) is the ability of the environment to yield the contaminant so that the treatment technology can effectively reduce it. In regards to the Lupton site, the petroleum hydrocarbon impact is adsorbed to fine-grained sediments (silts and clays), which typically have low permeability and are not readily remediated. However, if we focus the remedial efforts within the former UST pit (source area), which likely contains coarser grained backfill having a higher permeability, the remedial efforts should reduce the petroleum hydrocarbon impact. Typically, once the source area has been mitigated, the plume begins to collapse as a consequence of natural attenuation occurring along the plume fringe.

B&N proposes to perform a pilot study at the site to evaluate the effectiveness of enhanced natural attenuation utilizing hydrogen peroxide treatment within source area (Figure 1). Hydrogen peroxide treatment is being selected over other oxygen enhancement methods because a greater percentage of impacted area can be saturated with dissolved oxygen compared to other oxygen treatment methods (oxygen releasing

compound, sparging, etc.), which exhibit limited dispersion in fine-grained sediments. Hydrogen peroxide is a chemical oxidant, and when it comes in contact with organic contaminants, a chemical reaction occurs. The chemical reaction reduces the organic contaminant and generates water and dissolved oxygen as byproducts. For every part of hydrogen peroxide introduced in the groundwater, one-half part of oxygen can be produced (EPA 510-B-95-007, May 2004). The primary treatment objective is to maximize the dissolved oxygen treatment within the source area and minimize the volatilization loss of oxygen.

The treatment well design will consist of three to four, 4-inch diameter monitor wells located within the former UST pit. The proposed treatment area is highlighted on Figure 1; however, the configuration of the wells is yet to be determined pending a site visit to identify the presence of subgrade utilities, access and exposure concerns which still need to be addressed. The treatment well design will be similar to MW-2a, except that the screen interval will start at a shallower depth of 15 feet below ground surface.

B&N will be consulting several manufacturers and firms that have experience with this application. Because the hydrogen peroxide is considered an oxidant, certain precautions need to be addressed and monitored during the application process to minimize any potential risk hazards. EPA's document on *How to Evaluate Alternative Cleanup Technologies for Underground Storage Tank Sites (EPA 510-B-95-007)* is a useful reference document when evaluating applicable remedial technologies.

The treatment application parameters (percentage, flow rate, volume, etc.) will be determined after the treatment wells have been installed, developed and sampled for selected constituents. A slug test or pump test will be performed on one of the treatment wells to evaluate the hydraulic conductivity of the backfill/formation material, which will be used to calculate the optimal flow rate. The application period and frequency has not yet been determined but will be addressed after further research. Typically, the hydrogen peroxide is introduced into the subsurface at a 3% to 10% concentration. In the interim of researching and refining the treatment strategy, B&N will proceed with permitting and installation of the treatment wells unless otherwise indicated by EPA. In addition, following B&N's site visit, a work plan outlining the scope of services, period of the pilot study, monitoring and reporting criteria will be provided.

An advantage to the proposed treatment design compared to other treatment applications such as geoprobe injection techniques (single point treatment), is the flexibility of utilizing the treatment wells for monitoring contaminant concentrations, calculating groundwater gradient and the option to incorporate other treatment technologies. The other treatment options that may be used independently or used to complement the proposed treatment method consist of sparging, vapor extraction, nutrient applications, microbial enhancements, and use of surfactants, etc.

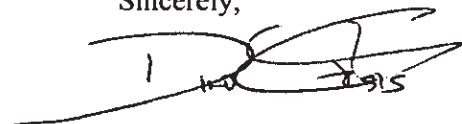
The scope of work leading up to the pilot study will be completed in several phases. The initial phase will consist of visiting the site, evaluating site conditions/utilities, collecting water level measurements and collecting a groundwater sample from MW-

July 28, 2004
Page 3

02a. The groundwater sample will be analyzed for petroleum hydrocarbons and for other constituents (redox potential, dissolved oxygen, ferrous iron, pH, etc.). The second phase of work will consist of permitting and the subsequent installation of the treatment wells. The final phase of work will consist of formulating the treatment techniques and initiating the pilot study. B&N plans on performing the site visit and sampling event during the first week of September 2004, have the treatment wells installed during October 2004 and initiate the pilot study during November 2004.

Should you have any questions or require additional documentation, please contact Mr. Robert Fishburn, Ultramar's Senior Project Manager at (559) 583-3251 or me at (602) 244-8100.

Sincerely,

A handwritten signature in black ink, appearing to read "Dino Gotsis", with a horizontal line drawn through it.

Dino Gotsis
Project Manager

cc Robert Fishburn, Ultramar
Henry Haven, Navajo Nation EPA

Attachment:

P/34914/doc/34914EPAtr#2

ATTACHMENT I

FIGURE



NAV-001

BURGESS & NIPLE

Ms. Laura L. Malone, Manager
Hazardous Waste Inspections & Compliance Unit
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix, AZ 85007

Re Speedy's Truck Stop 21387
Notice of Violation
Case ID 28959

June 24, 2004

Burgess & Niple, Inc.

5025 East Washington Street
Suite 212
Phoenix, AZ 85034
602 244.8100
Fax 602 244.1915

Dear Ms. Malone:

The enclosed non-hazardous waste manifest is provided for your records and corresponds with the above referenced notice of violation case file. As indicated in Burgess & Niple's March 29, 2004 correspondence, the eleven 55-gallon drums previously located at the site were associated with an on going leaking underground storage tank investigation being overseen and directed by the Environmental Protection Agency (EPA) Region 9 and Navajo EPA. The eleven waste drums were removed from the site on March 31, 2004 as documented on the enclosed non-hazardous waste manifest.

Should you require any additional documentation related to Ultramar's Site Characterization services, please contact Mr. Robert Fishburn, Ultramar's Senior Project Manager at (559) 583-3251 or me at (602) 244-8100.

Sincerely,

Dino Gotsis
Project Manager

cc Robert Fishburn, Ultramar
Walt Guggenheimer, EPA Region 9
Henry Haven, Navajo Nation EPA

Attachment: Manifest

ATTACHMENT A

Non-Hazardous Waste Manifest

NAV-001

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <div style="text-align: center;">N / A</div>		Manifest Document No. 52304		2. Page 1 of 1	
3. Generator's Name and Mailing Address Ultramar, Inc. 685 West Third Street Hanford, CA 93230-5016							
4. Generator's Phone (559) 589-3282 Robert Fishburn							
5. Transporter 1 Company Name Philip Transportation and Remediation, Inc		6. US EPA ID Number C A D 0 6 3 5 4 7 9 9 6		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone (602) 252-1186			
9. Designated Facility Name and Site Address PSC/21st Century Environmental Management, Inc 2095 East Newlands Drive Fernley, Nevada 89408		10. US EPA ID Number N V D 9 8 0 8 9 5 3 3 8		C. State Transporter's ID			
				D. Transporter 2 Phone			
				E. State Facility's ID			
				F. Facility's Phone (775) 575-2760			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		Unit	
a. NON RCRA REGULATED LIQUID WASTE (MONITORING WELL WATER)				10 D M		550 G	
b. NON RCRA REGULATED SOLID WASTE (MONITORING WELL SOIL)				1 D M		300 P	
c.							
d.							
G. Additional Descriptions for Materials Listed Above 11a. Profile #325268-009 x 55 W 85 AK 11b. Profile #325269-00 x 55				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information WEAR PROPER PROTECTIVE EQUIPMENT. EMERGENCY 24 HOUR CONTACT TELEPHONE #: (800) 898-8196 Site Address: Former Beacon Truckstop 12652, Lupton, Arizona, WST-8, Site# NAV-001							
HAZARDOUS WASTE							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name FRANK SANCHEZ-FOR ULTRAMAR				Signature <i>Frank Sanchez</i>		Date Month Day Year 03 31 04	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>Joe L. NAME</i>		Date Month Day Year 03 31 04	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.							
Printed/Typed Name				Signature		Date Month Day Year	

NON-HAZARDOUS WASTE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

April 10, 2003

REFER TO WST-8

AND SITE #NAV-001

Certified Mail: 7000 0520 0021 6109 6067

Mr. Robert Fishburn
Senior Program Manager
Ultramar, Inc.
685 West Third Street
Hanford, CA 93230

Dear Mr. Fishburn:

This correspondence refers to the Groundwater Assessment Work Plan (Work Plan), dated February 14, 2003, that was prepared by Allen Stephenson Associates for the former Beacon Truck Stop in Lupton, Arizona, on land of the Navajo Nation. As you know, the Work Plan was prepared in response to EPA's letter to your attention, dated October 22, 2002. EPA and the Navajo Nation EPA are approving the Work Plan, which only addresses the abandonment of monitoring wells MW-5, MW-6, MW-7 and MW-9 in accordance with federal and tribal regulations. This abandonment is being permitted because these wells have not shown hydrocarbon detections for 11 years.

If you have any questions or need more information, please contact Walt Guggenheimer of my staff at (415) 972-3377 or Henry Haven of the Navajo Nation EPA at (928) 871-7997.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lester Kaufman".

Lester Kaufman, Manager
Underground Storage Tanks Program Office

Enclosure

cc: Henry Haven, Navajo Nation EPA
Alan Downer, Navajo Nation HPD
Dino Gotsis, Allen Stephenson Associates

ENCLOSURE: LIST OF CONTACTS

Henry Haven, Geologist
Navajo Nation Environmental Protection Agency
P. O. Box 339
Window Rock, AZ 86515

(928) 871-7997

Alan Downer, Director
Navajo Nation Historic Preservation Department
P. O. Box 9000
Window Rock, AZ 86515

(928) 871-6437

Dino Gotsis
Environmental Project Manager
Allen Stephenson Associates
1130 E. Missouri Avenue, Suite 110
Phoenix, AZ 85014

(602) 263-9522



Allen
Stephenson
Associates

NAV-001

February 14, 2003

Mr. Walter Guggenheimer
United States Environmental Protection Agency, Region XI
Underground Storage Tanks Program Office
75 Hawthorne Street (WST-8)
San Francisco, CA 94105

**RE: Groundwater Assessment Work Plan
Former Beacon Truck Stop #652, Lupton, Arizona, February 14, 2003**

Dear Guggenheimer:

On behalf of Ultramar, Inc. (Ultramar), Allen, Stephenson & Associates has prepared the enclosed groundwater assessment work plan pursuant to the Environmental Protection Agency's correspondence dated October 22, 2002.

Should you have any questions concerning the enclosed work plan, please contact Robert Fishburn, Ultramar's Senior Project Manager at (559) 582-0241 or me at (602) 263-9522.

Sincerely
Allen, Stephenson & Associates

Dino Gotsis
Environmental Programs Manager

cc Robert Fishburn, Ultramar
Henry Haven, NEPA

Enclosure: Groundwater Assessment Work Plan



"Fishburn, Rob"
<Rob.Fishburn@valero
.com>

10/02/2002 03:48 PM

To: Walter Guggenheimer/R9/USEPA/US@EPA
cc: 'Britt Callahan' <bcallahan@allenstephenson.com>
Subject: Former Beacon Truck Stop #12652 in Lupton, AZ, WST-8, Site # NAV-001

Dear Mr. Guggenheimer:

Good afternoon. I am employed by Ultramar Inc. who is currently managing the environmental monitoring and cleanup efforts related to the above-referenced site. Ultramar has employed Allen Stevenson & Associates as environmental consultants managing the groundwater monitoring and cleanup activities at the site. I believe you have been in verbal communication with Britt Callahan. I am writing you today for some clarification of a few issues regarding the site. I understand that you are the EPA representative regulating the site. Additionally, I understand that the Navajo EPA (Henry Haven) is also regulating the property as well. Which agency is ultimately responsible for directing/regulating the site and what level of coordination exists between the two agencies? In the event that closure is warranted down the road, which agency issues that closure letter? Do you know if there is an agency that regulates current environmental compliance issues with the current owners/operators of the property? Ultramar sincerely appreciates your time and efforts in addressing these questions.

Sincerely,

Rob Fishburn
Sr. Project Manager
Corporate Environmental Services
Ultramar, Inc. / A Valero Company
Office - 559-583-3345
Fax - 559-583-3282
Email - rob.fishburn@valero.com

NAV-001

Ultramar

Ultramar, Inc.
685 W. Third Street
Hanford, CA 93230-5016
(559) 582-0241

Fax: 559-583-3282 Environmental
559-583-3256 Retail Administration
559-583-3330 Human Resource
559-583-3382 Maintenance

October 28, 2002

Mr. Walter Guggenheimer
United States Environmental Protection Agency, Region IX
Underground Storage Tank Program Office
75 Hawthorne Street (WST-8)
San Francisco, CA 94105-3901

**SUBJECT: FORMER BEACON TRUCKSTOP 12652, LUPTON, ARIZONA, WST-8,
SITE # NAV-001**

Dear Mr. Guggenheimer:

Ultramar has received your letter dated October 22, 2002, enclosed. Ultramar will pursue the installation of a new monitoring well in the vicinity of former MW-2 as you have required. Additionally, Ultramar will pursue an investigation down-gradient of former MW-2 and current MW-8. However, I have personally witnessed and photographed ponding fuel on native soils near the site from the current operator's activities. The ponding fuel on native soils could possibly contribute as a new source of contamination to the subsurface. Additionally, a large portion of the property is covered over by gravel and broken up asphalt, allowing for surface spills to continually contribute to subsurface impacts. Down-gradient assessment activities would likely encounter these possible new sources of contamination. Ultramar does not believe it should be responsible for the current operator's possible contributions to subsurface soil and/or groundwater contamination.

Additionally in response to your letter, Ultramar is curious as to why the analytical results must be submitted within seven days upon receipt of the laboratory analysis. This has not been required in the past, and would greatly step up the reporting process when it does not appear to be necessary to do so. The site does not appear to be a high-priority site, and multiple resources have to be pooled together in order to produce the semi-annual reports. Ultramar appreciates your further guidance on this matter.

N:\MSOFFICE\Environmental Files\Southern Zone\12652\10/28/02



A Member of the Ultramar Group of Companies

BEACON
#1 Quality And Service

If you have any questions regarding this letter, please contact me at (559) 583-3345.

Sincerely,

ULTRAMAR INC.

A handwritten signature in black ink, appearing to read 'R. Fishburn', with a long horizontal flourish extending to the right.

Robert D. Fishburn
Senior Project Manager
Marketing Environmental Department

Enclosures

cc: Mr. Henry Haven, Navajo EPA, Division of Natural Resource Office, P.O. Box 339,
Windowrock, AZ 85615

cc: Mr. Britt Callahan, Allen Stephenson & Associates



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

Underground Storage Tanks Program Office
75 Hawthorne Street (WST-8)
San Francisco, CA 94105

October 22, 2002

10/28/02
RECEIVED
OCT 28 2002

BY:

REFER TO WST-8

AND SITE #NAV-001

Certified Mail: 7000 0520 0021 6106 1386

Mr. Robert Fishburn
Senior Project Manager
Ultramar, Inc.
685 West Third Street
Hanford, CA 93230

Dear Mr. Fishburn:

This correspondence refers to the semi-annual groundwater sampling report dated August 27, 2002, prepared by Allen, Stephenson & Associates for the former Beacon Truck Stop #652, in Lupton, Arizona, on land of the Navajo Nation.

Based on our review of the sampling report and a telephone discussion with Mr. Britt Calahan of Allen Stephenson & Associates, EPA requires the following changes in the semi-annual groundwater sampling program:

- * Replace well MW-2 that was abandoned during the removal of four USTs in 1997, and include it in the semi-annual sampling program. The analytical results for the last sample collected at former well MW-2 on October 17, 1996 showed a benzene concentration of 420 $\mu\text{g/L}$.
- * Starting with the next sampling event, sample only wells MW-2, MW-4 and MW-8, and send the analytical results to EPA and Navajo Nation EPA within seven days of your receipt of the laboratory analyses.
- * Obtain groundwater data downgradient of wells MW-8 and MW-2 to investigate the extent of hydrocarbon contamination, and include the results in the semi-annual report.

Please call Walt Guggenheimer of my staff at (415) 972-3377 if you have questions or need more information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lester Kaufman", followed by the initials "LK".

Lester Kaufman, Manager
Underground Storage Tanks Program Office

Enclosure

cc: Arlene Luther, Navajo Nation EPA
Alan Downer, Navajo Nation HPD
Britt Callahan, Allen, Stephenson & Associates

ENCLOSURE: LIST OF CONTACTS

Arlene Luther, Director
Waste Regulatory & Compliance Department
Navajo Nation Environmental Protection Agency
P.O. Box 339
Window Rock, AZ 86515

(928) 871-7994

Alan Downer, Director
Navajo Nation Historic Preservation Department
P. O. Box 9000
Window Rock, AZ 86515

(928) 871-6437

Britt Callahan R. G.
Project Manager
Allen, Stephenson & Associates
1130 E. Missouri Avenue, Suite 110
Phoenix, AZ 85014

(602) 263-9522



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

**Underground Storage Tanks Program Office
75 Hawthorne Street (WST-8)
San Francisco, CA 94105**

October 22, 2002

**REFER TO WST-8
AND SITE #NAV-001**

Certified Mail: 7000 0520 0021 6106 1386

Mr. Robert Fishburn
Senior Project Manager
Ultramar, Inc.
685 West Third Street
Hanford, CA 93230

Dear Mr. Fishburn:

This correspondence refers to the semi-annual groundwater sampling report dated August 27, 2002, prepared by Allen, Stephenson & Associates for the former Beacon Truck Stop #652, in Lupton, Arizona, on land of the Navajo Nation.

Based on our review of the sampling report and a telephone discussion with Mr. Britt Calahan of Allen Stephenson & Associates, EPA requires the following changes in the semi-annual groundwater sampling program:

- * Replace well MW-2 that was abandoned during the removal of four USTs in 1997, and include it in the semi-annual sampling program. The analytical results for the last sample collected at former well MW-2 on October 17, 1996 showed a benzene concentration of 420 $\mu\text{g/L}$.
- * Starting with the next sampling event, sample only wells MW-2, MW-4 and MW-8, and send the analytical results to EPA and Navajo Nation EPA within seven days of your receipt of the laboratory analyses.
- * Obtain groundwater data downgradient of wells MW-8 and MW-2 to investigate the extent of hydrocarbon contamination, and include the results in the semi-annual report.

Please call Walt Guggenheimer of my staff at (415) 972-3377 if you have questions or need more information.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lester Kaufman" followed by a stylized monogram "LK".

Lester Kaufman, Manager
Underground Storage Tanks Program Office

Enclosure

cc: Arlene Luther, Navajo Nation EPA
Alan Downer, Navajo Nation HPD
Britt Callahan, Allen, Stephenson & Associates

NAV-001

Ultramar

Ultramar, Inc.
685 W. Third Street
Hanford, CA 93230-5016
(559) 582-0241

Fax: 559-583-3282 Environmental
559-583-3256 Retail Administration
559-583-3330 Human Resource
559-583-3382 Maintenance

September 9, 2002

Mr. Henry Haven
Navajo EPA
Division of Natural Resource Office
P.O. Box 339
Windowrock, AZ 85615

**SUBJECT: FORMER BEACON TRUCKSTOP 12652, LUPTON, ARIZONA, WST-8,
SITE # NAV-001**

Dear Mr. Haven:

Enclosed you will find a copy of the ***Semiannual Report Summarizing Groundwater Sampling Activities***, for the above-referenced former Ultramar Inc. facility, prepared by Allen Stephenson & Associates. The report summarizes field monitoring activities performed on June 25 & 26, 2002.

If you have any questions regarding the report, please call me at (559) 583-3345.

Sincerely,

ULTRAMAR INC.



Robert D. Fishburn
Senior Project Manager
Marketing Environmental Department

Enclosures

cc: Mr. Walter Guggenheimer, Mail Code H-2-1, United States Environmental
Protection Agency, Region IX, 75 Hawthorne Street, San Francisco, CA 94105-
3901





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

MAR 30 1992

In Reply Refer to: H-2-1
Site: NAV 001
Certified Mail: P 878 533 580

Glen Dembroff
Beacon, An Ultramar Company
525 West Third Street
Hanford, CA 92320

Dear Mr. Dembroff

The U.S. Environmental Protection Agency (EPA) has recently reviewed the file on the Bingo Truck Stop in Lupton, Arizona, on the Navajo Nation. The recent report on the analytical results dated December 10, 1991, provided the results of water and soil samples taken from MW-5 and MW-6. These samples show little contamination and will be used to delineate the extent of the contaminated area. Because there is contamination, EPA cannot grant the requested closure status.

The analytical results of the first four monitoring wells, collected over a four year period from April, 1986, through July, 1990, originally showed a downward trend. However, after January 1988, this trend stabilized or showed an increase. This trend does not provide solid evidence that the contamination will attenuate as the reports indicated.

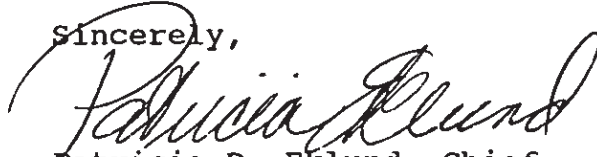
The change in the elevated levels of benzene from MW-2, 5.0 ppm in April, 1986, to 0.1370 ppm in September, 1988, are still over maximum allowable limits of 0.005 ppm. The soil samples taken from the same monitoring well also showed elevated levels of total petroleum hydrocarbons (TPH). The results of the soil analyses are listed in the report dated April 30, 1986. At a depth of 20 feet the TPH level was 4675 ppm. This decreased to 2300 ppm at 35 feet. Both of these measurements exceed the maximum allowable limit of 100 ppm limit for TPH in soil.

Based on the contaminated soil problem and the February, 1990, failure of three of the underground storage tanks (UST) to pass the tightness test, EPA is requesting that you develop a remediation plan that will address the contaminated soil and ground water in the area.

Pursuant to §9005 [42 U.S.C. §6991(d)] of the Resource Conservation and Recovery Act (RCRA), as amended, EPA requires that you furnish the above information, postmarked within 30 days of the receipt of this letter. **Your immediate attention is**

needed in this matter. Pursuant to §9006 [42 U.S.C. §6991(e)] of RCRA, refusal to provide the requested information by the specified deadline may result in the issuance of an administrative compliance order or the initiation of civil action, which may include an assessment of civil penalties of up to \$10,000 per tank for each day of violation. If you have any questions, please contact Matthew Small at (415) 744-2077.

Sincerely,



Patricia D. Eklund, Chief
Office of Underground Storage Tanks

cc: Norma Cady, Navajo EPA
Chuck Dowell, OEH, IHS
Leonard Robbins, US Department of Interior, BIA
H-2-1 Reading File
Site File ✓

Attachment: List of Contacts

Norma Cady
Navajo EPA
P.O. Box 308
Window Rock AZ 86515

Chuck Dowell
OEH, IHS
Box G
Window Rock AZ 86515

Leonard Robbins
US Department of Interior, BIA
Environmental Quality Services - Box 1060
Gallup NM 87301



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

FIFE SYMINGTON, GOVERNOR
EDWARD Z. FOX, DIRECTOR

CERTIFIED MAIL
Return Receipt Requested

Date: December 9, 1991
CAU DOC# CAU13317

Mr. J. E. Dunn, Jr.
Native American UST Coordinator
EPA Region IX
1243 W. Carla Vista Drive
Chandler, Arizona 85224

RE: UST File #4715.0747 BEACON OIL, LUPTON TRUCK STOP
I-40 at Grant Road Exit
Lupton, Arizona 86508

Dear Mr. Dunn:

The Arizona Department of Environmental Quality (ADEQ) is forwarding the results of several tank tightness tests conducted at the subject site. The site is located on Indian lands and is therefore under the regulation of the Environmental Protection Agency (EPA). In a telephone conversation with Ms. Sandy Huff of Beacon Oil, (October 17, 1991) the Department requested that representatives of Beacon Oil forward all future correspondences pertaining to this case to your Department.

We appreciate your assistance. If you have any questions please call (602)257-6865.

Sincerely,

A handwritten signature in cursive script, reading "Corrine M. Dalzell", is written over the typed name.

Corrine M. Dalzell, Compliance Officer
UST Corrective Actions Unit

cc: Peggy Guichard-Watters, Acting Manager, UST Section
Wendy Kristin, Manager, UST Corrective Actions Unit
Dale Ohnmeiss, Team Leader, RPT Lead I, Corrective Actions Unit

Enclosures

The Department of Environmental Quality is An Equal Opportunity Affirmative Action Employer.

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Phoenix, Arizona 85001-0600

NAV-001-L

Ultramar

Ultramar, Inc.
685 W. Third Street
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(559) 582-0241

Fax: 559-583-3282 Environmental
559-583-3256 Retail Administration
559-583-3330 Human Resource
559-583-3382 Maintenance

June 12, 2003

Mr. Mark Nicholson
Speedy's Truckstop
1443 South 550 East
Orem, UT 84097

**SUBJECT: FORMER BEACON TRUCKSTOP 12652, LUPTON, ARIZONA, WST-8,
SITE # NAV-001**

Dear Mr. Nicholson:

This letter will serve as a notice that the United States, Environmental Protection Agency (EPA) has directed Ultramar Inc. to conduct further environmental work at the above-referenced facility. Enclosed you will find a copy of a site map indicating the locations of proposed soil borings and replacement well MW-2A, as well as the EPA approval and directive letter dated May 7, 2003.

The field activities are being performed to further assess groundwater quality issues near formerly abandoned monitoring well MW-2 and down-gradient of monitoring well MW-8. Additionally, Ultramar is being directed to abandon four monitoring wells (MW-5, MW-6, MW-7, and MW-9) at the site. Ultramar has contracted Allen Stevenson & Associates to conduct the proposed field and reporting activities. Field activities are scheduled to begin on July 21, 2003 and end on July 24, 2003. Ultramar will conduct the work as to minimize any disruptions to Speedy's Truckstop operations, however minor disruptions will be unavoidable.

If you have any questions regarding this notice, please contact me at (559) 583-3345.

Sincerely,

ULTRAMAR INC.



Robert D. Fishburn
Senior Project Manager
Marketing Environmental Department

Enclosures

N:\MSOFFICE\Environmental Files\Southern Zone\12652\06/13/03



A Member of the Ultramar Group of Companies

BEACON
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cc:

w/encl.

Mr. Walter Guggenheimer, Mail Code H-2-1, United States Environmental Protection Agency, Region IX, 75 Hawthorne Street, San Francisco, CA 94105-3901

w/encl.

Mr. Henry Haven, Navajo EPA, Division of Natural Resource Office, P.O. Box 339, Windowrock, AZ 85615

w/encl.

Dino Gotsis, Allen Stephenson Associates, Phoenix, AZ

LEGEND

- MW-5 GROUNDWATER MONITORING WELL LOCATION AND IDENTIFICATION
- MW-1 ABANDONED GROUNDWATER MONITORING WELL LOCATION
- MW-2A PROPOSED GROUNDWATER SAMPLING LOCATION
- WS-5 UNDER GROUND STORAGE TANK
- UST ABOVE GROUND STORAGE TANK
- AST PROPERTY BOUNDARY
- FENCE FENCE
- TS UST IDENTIFICATION NAME
- CONCRETE SURFACE
- AREA ENCLOSED BY DIRT CONTAINMENT BERM
- (33.25)
(6143.82) DEPTH TO GROUNDWATER (FEET ABOVE TOP OF CASING)
- (33.25)
(6143.82) GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL FOR JUNE 2000 SEMI-ANNUAL GROUNDWATER SAMPLING EVENT

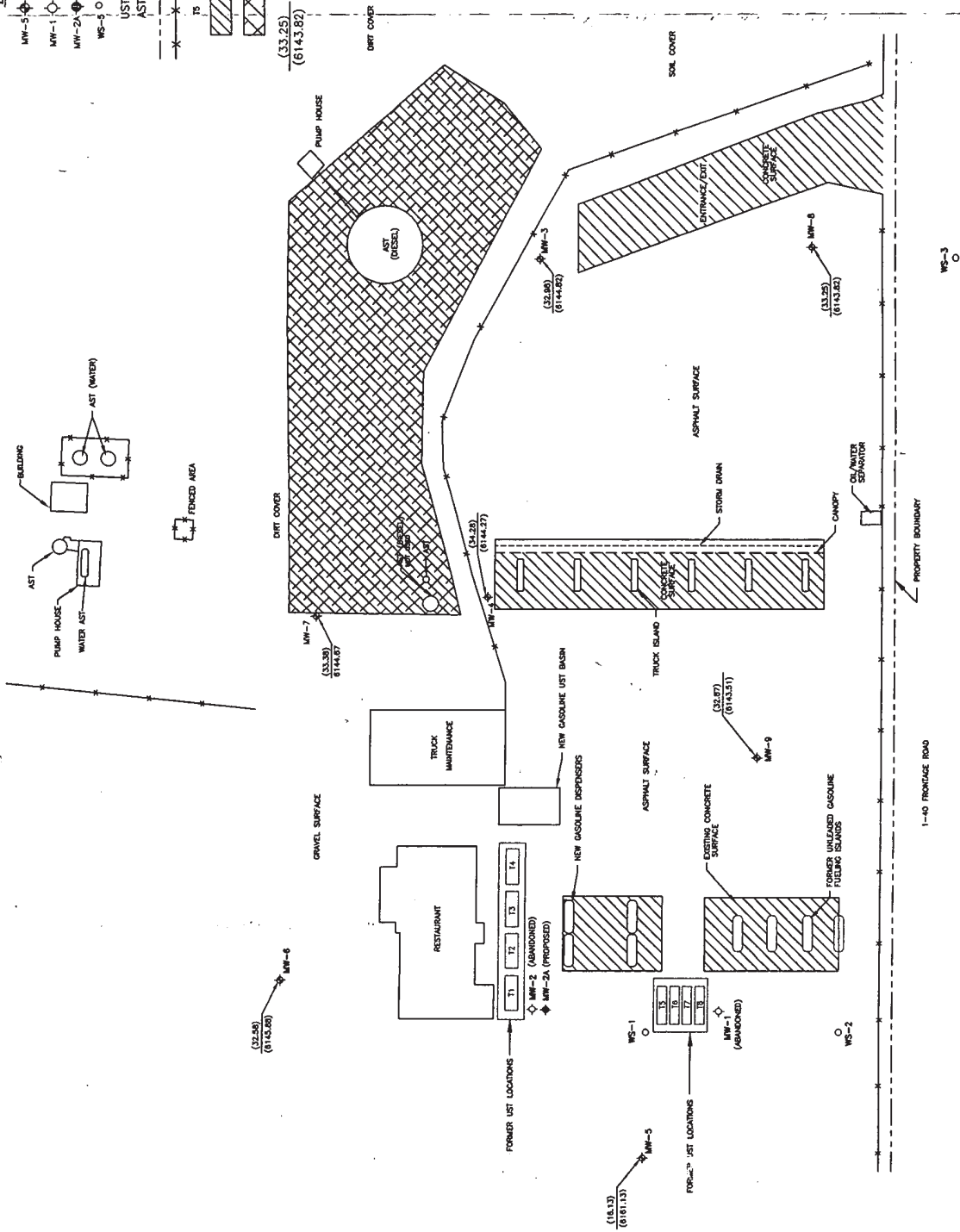


FIGURE 2
PROPOSED GROUNDWATER SAMPLING LOCATIONS
BEACON TRUCK STOP #652
EXIT 359, GRANT ROAD AND I-40
LUPTON, ARIZONA

NOTE: THIS DRAWING ADAPTED FROM DELTA DRAWING NAME: FIGURE 1 DATED: FEB. 11, 1997

ALLEN, STEPHENSON & ASSOCIATES
HYDROLOGIC & ENVIRONMENTAL CONSULTING
1130 EAST MISSOURI AVENUE SUITE 110 PHOENIX, ARIZONA 85014



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
Underground Storage Tanks Program Office
75 Hawthorne Street (WST-8)
San Francisco, CA 94105

652

5/12/03

May 7, 2003

REFER TO WST-8
AND SITE #NAV-001
Certified Mail: 7000 0520 0021 6109 6111

Mr. Robert Fishburn
Senior Project Manager
Marketing Environmental Department
Ultramar, Inc.
685 West Third Street
Hanford, CA 93230-5016

Dear Mr. Fishburn:

This correspondence refers to your discussion with Walt Guggenheimer of my staff on May 5, 2003 regarding the work plan, dated February 14, 2003, that was prepared by Allen Stephenson Associates for the former Beacon Truck Stop #652 in Lupton, Arizona, on land of the Navajo Nation.

This letter supercedes our correspondence to you, dated April 10, 2003, which mistakenly approved only the abandonment of monitoring wells MW-5, MW-6, MW-7 and MW-9. Please be advised that EPA and the Navajo Nation EPA (NNEPA) are approving the entire work plan which includes the following measures, in addition to the abandonment of four monitoring wells:

- * Replace well MW-2 that was abandoned during the removal of four USTs in 1997, and include it in the semi-annual sampling program. The analytical results for the last groundwater sample collected at former well MW-2 on October 17, 1996 showed a benzene concentration of 420 $\mu\text{g/L}$.
- * Starting with the next sampling event, sample only wells MW-2, MW-4 and MW-8, and send the analytical results to EPA and Navajo Nation EPA within seven days of your receipt of the laboratory analyses.
- * Obtain groundwater data downgradient of wells MW-2 and MW-8 to investigate the extent of hydrocarbon contamination, and include the results in the semi-annual report.

We apologize for any potential inconvenience during the work plan approval process. Please call Walt Guggenheimer of my staff at (415) 972-3377 or Henry Haven at (928) 871-7997 if you have questions or need more information.

Sincerely,


Lester Kaufman, Manager
Underground Storage Tanks Program Office

Enclosure

cc: Henry Haven, Navajo Nation EPA
Alan Downer, Navajo Nation HPD
Dino Gotsis, Allen Stephenson Associates

ENCLOSURE: LIST OF CONTACTS

Henry Haven, Geologist
Navajo Nation Environmental Protection Agency
P. O. Box 339
Window Rock, AZ 86515

(928) 871-7997

Alan Downer, Director
Navajo Nation Historic Preservation Department
P. O. Box 9000
Window Rock, AZ 86515

(928) 871-6437

Dino Gotsis,
Environmental Programs Manager
Allen Stephenson Associates
1130 E. Missouri Avenue #110
Phoenix, AZ 85014

(602) 263-9522

NAV-001

Ultramar

Ultramar, Inc.
685 W. Third Street
Hanford, CA 93230-5016
(559) 582-0241

Fax: 559-583-3282 Environmental
559-583-3256 Retail Administration
559-583-3330 Human Resource
559-583-3382 Maintenance

September 24, 2001

Ms. Michelle Morris
Navajo EPA
Division of Natural Resource Office
P.O. Box 339
Windowrock, AZ 85615

**SUBJECT: FORMER BEACON TRUCKSTOP 12652, LUPTON, ARIZONA, WST-8,
SITE # NAV-001**

Dear Ms. Morris:

Enclosed you will find a copy of the **Semi-Annual Ground Water Monitoring Report, First Half 2001**, for the above-referenced former Ultramar Inc. facility, prepared by Delta Environmental Consultants, Inc. The report summarizes field monitoring activities performed on May 31, 2001.

If you have any questions regarding the report, please call me at (559) 583-3345.

Sincerely,

ULTRAMAR INC.



Robert D. Fishburn
Senior Project Manager
Marketing Environmental Department

Enclosures

cc: Mr. Walter Guggenheimer, Mail Code H-2-1, United States Environmental
Protection Agency, Region IX, 75 Hawthorne Street, San Francisco, CA 94105-
3901

N:\MSOFFICE\Environmental Files\Southern Zone\12652\09/24/01



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BEACON
#1 Quality And Service

RECEIVED



Delta
Environmental
Consultants, Inc.

BY:-----3164 Gold Camp Drive
Suite 200
Rancho Cordova, CA 95670-6021
U.S.A.
916/638-2085
FAX: 916/638-8385

July 25, 2001

Mr. Rob Fishburn
Ultramar Inc.
525 West Third Street
Hanford, CA 93230

Subject: *Semi-Annual Ground Water Monitoring Report, First Half 2001*
Beacon Truck Stop No. 652
Lupton, Arizona
Delta Project No. D193-103

Dear Mr. Fishburn:

This report describes ground water monitoring activities conducted on **May 31, 2001**. The interpretations contained in this report represent our professional opinions and are based, in part, on information supplied by the client. These opinions are based on currently available information and are arrived at in accordance with currently accepted hydrogeologic and engineering practices at this time and location. Other than this, no warranty is implied or intended.

If you have any questions concerning this project, please contact Michael Berrington at (916) 536-2616.

DELTA ENVIRONMENTAL CONSULTANTS, INC.

Brett Bardley
for

Trevor L. Atkinson
Project Engineer

Michael A. Berrington

Michael A. Berrington, R.G.
Project Manager
California Registered Geologist No. 7124

TLA (Lrp007.103.doc)

STATUS OF GROUND WATER MONITORING

Delta Environmental Consultants, Inc. (Delta) has been authorized by Ultramar Inc. to perform ground water monitoring oversight for the subject site. This report describes ground water monitoring activities conducted during May 31, 2001.

Cumulative ground water sampling information is tabulated in Table 1. A site location map, site map and ground water elevation contour map are shown as Figures 1 through 3, respectively.

Work Performed during May 2001:

- Performed ground water sampling on May 31, 2001.

May 2001 GROUND WATER MONITORING RESULTS:

Monitoring Well	Date	Depth to Ground Water (ft)	Ground Water Elevation (MSL)	Benzene (mg/L)	Toluene (mg/L)	Ethyl-benzene (mg/L)	Total Xylenes (mg/L)	MTBE [8021B] (mg/L)	EFH (C10-C22) (mg/L)	EFH (C22-C32) (mg/L)	Total EFH (C10-C32) (mg/L)	VFH [8015B] (mg/L)
MW-1	05/31/01	NM	NC	NS	NS	NS	NS	NS	NS	NS	NS	NS
MW-2	05/31/01	NM	NC	NS	NS	NS	NS	NS	NS	NS	NS	NS
MW-3	05/31/01	32.61	6145.19	<0.0005	<0.001	<0.001	<0.0015	<0.005	<0.25	<0.25	<0.5	<0.2
MW-4	05/31/01	33.60	6144.95	0.0099	<0.001	<0.001	<0.0015	0.0087	<0.25	<0.25	<0.5	<0.2
MW-5	05/31/01	16.08	6161.18	<0.0005	<0.001	<0.001	<0.0015	<0.005	<0.25	<0.25	<0.5	<0.2
MW-6	05/31/01	31.94	6146.52	<0.0005	<0.001	<0.001	<0.0015	0.029	<0.25	<0.25	<0.5	<0.2
MW-7	05/31/01	31.35	6146.70	<0.0005	<0.001	<0.001	<0.0015	<0.005	<0.25	<0.25	<0.5	<0.2
MW-8	05/31/01	32.19	6144.88	0.011	<0.001	<0.001	<0.0015	<0.005	<0.25	<0.25	<0.5	<0.2
MW-9	05/31/01	32.04	6144.34	<0.0005	<0.001	<0.001	<0.0015	<0.005	<0.13	<0.13	<0.25	<0.2

mg/L = milligrams per liter; NS = Not Sampled; MSL = feet above mean sea level; EFH = Extractable Fuel Hydrocarbons (Diesel & Oil); VFH = Volatile Fuel Hydrocarbons

CONCLUSIONS/RECOMMENDATIONS

Delta recommends continued semi-annual ground water monitoring.

Enclosures:

- Enclosure A: Field Methods & Procedures and Quality Assurance Plan
- Enclosure B: Ground Water Sampling Information
- Enclosure C: Hydrograph for Monitoring Wells MW-1 through MW-9
- Enclosure D: Ground Water Monitoring Analytical Results

TABLE 1

GROUND WATER ELEVATION MONITORING

Former Beacon Truck Stop No. 652
Exit 359, Grant Road and Interstate 40
Lupton, Arizona

Well No.	Wellhead Elevation (ft above msl)	Date	Ground Water Depth (ft)	Depth to Free Product (ft)	Free Product Thickness (ft)	Ground Water Elevation (ft above msl)
MW-1	6178.49	06/25/93	30.81	-	0	6,147.68
		11/30/93	31.28	-	0	6,147.21
		03/15/94	31.34	-	0	6,147.15
		07/22/94	31.57	-	0	6,146.92
	6176.95	03/29/95	30.59	-	0	6,146.36
		07/18/95	31.10	-	0	6,145.85
		03/21/96	31.49	-	0	6,145.46
		10/17/96	32.30	-	0	6,144.65
		12/11/97	Abandoned			
MW-2	6179.42	06/25/93	31.73	-	0	6,147.69
		11/30/93	32.23	-	0	6,147.19
	6179.43	03/15/94	32.19	-	0	6,147.14
		07/22/94	32.39	-	0	6,146.94
	6177.80	03/29/95	31.37	-	0	6,146.43
		07/18/95	NR	-	0	NR
		03/21/96	32.33	-	0	6,145.47
		10/17/96	32.96	-	0	6,144.84
		12/11/97	Abandoned			

TABLE 1

GROUND WATER ELEVATION MONITORING

Former Beacon Truck Stop No. 652
Exit 359, Grant Road and Interstate 40
Lupton, Arizona

Well No.	Wellhead Elevation (ft above msl)	Date	Ground Water Depth (ft)	Depth to Free Product (ft)	Free Product Thickness (ft)	Ground Water Elevation (ft above msl)
MW-3	6179.43	06/25/93	32.27	-	0	6,147.16
		11/30/93	32.53	-	0	6,146.90
		03/15/94	32.66	-	0	6,146.77
		07/22/94	32.26	-	0	6,147.17
	6177.80	03/29/95	32.05	-	0	6,145.75
		07/18/95	32.07	-	0	6,145.73
		03/21/96	32.12	-	0	6,145.68
		10/17/96	32.54	-	0	6,145.26
		12/11/97	33.44	-	0	6,144.36
		07/20/98	32.43	-	0	6,145.37
		12/17/98	32.45	-	0	6,145.35
		07/06/99	32.57	-	0	6,145.23
		12/15/99	32.65	-	0	6,145.15
		8/24/00	32.86	-	0	6,144.94
		12/19/00	32.80	-	0	6,145.00
		05/31/01	32.61	-	0	6,145.19
MW-4	6180.14	06/25/93	31.90	-	0	6,148.24
		11/30/93	32.42	-	0	6,147.72
		03/15/94	32.57	-	0	6,147.57
		07/22/94	32.45	-	0	6,147.69
	6178.55 ^a	03/29/95	31.75	-	0	6,146.80
		07/18/95	32.09	-	0	6,146.46
		03/21/96	32.57	-	0	6,145.98
		10/17/96	33.28	-	0	6,145.27
		12/11/97	33.87	-	0	6,144.68
		07/20/98	33.18	-	0	6,145.37
		12/17/98	33.22	-	0	6,145.33
		07/06/99	33.63	-	0	6,144.92
		12/15/99	33.65	-	0	6,144.90
		8/24/00	34.43	-	0	6,144.12
		12/19/00	33.93	-	0	6,144.62
		05/31/01	33.60	-	0	6,144.95

TABLE 1

GROUND WATER ELEVATION MONITORING

Former Beacon Truck Stop No. 652
Exit 359, Grant Road and Interstate 40
Lupton, Arizona

Well No.	Wellhead Elevation (ft above msl)	Date	Ground Water Depth (ft)	Depth to Free Product (ft)	Free Product Thickness (ft)	Ground Water Elevation (ft above msl)
MW-5	6178.75	06/25/93	14.63	-	0	6,164.12
		11/30/93	15.14	-	0	6,163.61
		03/15/94	15.71	-	0	6,163.04
		07/22/94	15.01	-	0	6,163.74
	6177.26	03/30/95	14.89	-	0	6,162.37
		07/18/95	14.63	-	0	6,162.63
		03/21/96	15.63	-	0	6,161.63
		10/17/96	16.01	-	0	6,161.25
		12/11/97	17.03	-	0	6,160.23
		07/20/98	15.86	-	0	6,161.40
		12/17/98	15.73	-	0	6,161.53
		07/06/99	16.02	-	0	6,161.24
		12/15/99	16.02	-	0	6,161.24
		8/24/00	16.16	-	0	6,161.10
		12/19/00	16.20	-	0	6,161.06
		05/31/01	16.08	-	0	6,161.18
MW-6	6180.00	06/25/93	29.09	-	0	6,150.91
		11/30/93	29.97	-	0	6,150.03
		03/15/94	30.05	-	0	6,149.95
		07/22/94	29.68	-	0	6,151.32
	6178.46	03/30/95	29.46	-	0	6,149.00
		07/18/95	29.37	-	0	6,149.09
		03/21/96	30.22	-	0	6,148.24
		10/17/96	30.82	-	0	6,147.64
		12/11/97	NM	NM	NC	NC
		07/20/98	NM	NM	NC	NC
		12/17/98	NM	NM	NC	NC
		07/06/99	NM	NM	NC	NC
		12/15/99	NM	NM	NC	NC
		8/24/00	NM	NM	NC	NC
		12/19/00	NM	NM	NC	NC
		05/31/01	31.94	-	0	6,146.52

TABLE 1

GROUND WATER ELEVATION MONITORING

Former Beacon Truck Stop No. 652
Exit 359, Grant Road and Interstate 40
Lupton, Arizona

Well No.	Wellhead Elevation (ft above msl)	Date	Ground Water Depth (ft)	Depth to Free Product (ft)	Free Product Thickness (ft)	Ground Water Elevation (ft above msl)
MW-7	6178.05	03/29/95	28.70	-	0	6,149.35
		07/18/95	29.07	-	0	6,148.98
		03/21/96	29.84	-	0	6,148.21
		10/17/96	30.37	-	0	6,147.68
		12/11/97	NM	NM	NC	NC
		07/20/98	NM	NM	NC	NC
		12/17/98	NM	NM	NC	NC
		07/06/99	NM	NM	NC	NC
		12/15/99	NM	NM	NC	NC
		8/24/00	NM	NM	NC	NC
		12/19/00	NM	NM	NC	NC
		05/31/01	31.35	-	0	6,146.70
MW-8	6177.07	03/29/95	30.33	-	0	6,146.74
		07/18/95	30.93	-	0	6,146.14
		03/21/96	31.23	-	0	6,145.84
		10/17/96	31.95	-	0	6,145.12
		12/11/97	32.50	-	0	6,144.57
		07/20/98	32.28	-	0	6,144.79
		12/17/98	31.87	-	0	6,145.20
		07/06/99	32.48	-	0	6,144.59
		12/15/99	32.08	-	0	6,144.99
		8/24/00	NM	NM	NC	NC
		12/19/00	NM	NM	NC	NC
		05/31/01	32.19	-	0	6,144.88

TABLE 1

GROUND WATER ELEVATION MONITORING

Former Beacon Truck Stop No. 652
Exit 359, Grant Road and Interstate 40
Lupton, Arizona

Well No.	Wellhead Elevation (ft above msl)	Date	Ground Water Depth (ft)	Depth to Free Product (ft)	Free Product Thickness (ft)	Ground Water Elevation (ft above msl)
MW-9	6176.38	03/29/95	30.59	-	0	6,145.79
		07/18/95	30.48	-	0	6,145.90
		03/21/96	30.70	-	0	6,145.68
		10/17/96	31.54	-	0	6,144.84
		12/11/97	32.27	-	0	6,144.11
		07/20/98	31.87	-	0	6,144.51
		12/17/98	31.48	-	0	6,144.90
		07/06/99	32.16	-	0	6,144.22
		12/15/99	31.85	-	0	6,144.53
		8/24/00	32.65	-	0	6,143.73
		12/19/00	32.10	-	0	6,144.28
		05/31/01	32.04	-	0	6,144.34

* = Information regarding ground water elevations for MW-4 was recalculated due to an incorrect reference elevation used after 03/29/95.

ft = feet

msl = mean sea level

NR = Depth to ground water measurement was not recorded due to equipment malfunction.

NM = Not measured.

NC = Not calculated.

- = Free product not detected.

TABLE 2

SUMMARY OF GROUND WATER ANALYTICAL RESULTS

Former Beacon Truck Stop No. 652
Exit 359, Grant Road and Interstate 40
Lupton, Arizona

Well ID	Sample Date	Benzene (mg/L)	Toluene (mg/L)	Ethyl-benzene (mg/L)	Xylenes (mg/L)	TRPH (mg/L)	MTBE (mg/L)	EFH (C10-C22) (mg/L)	EFH (C22-C32) (mg/L)	TEFH (C10-C32) (mg/L)	VFH (mg/L)
MW-1	04/25/86	0.07	0.5	0.002	0.02	NA	NA	NA	NA	NA	1.7
	12/31/86	0.007	0.007	<0.0005	0.004	NA	NA	NA	NA	NA	0.085
	07/13/90*	0.007	<0.0005	<0.0005	<0.0005	NA	NA	NA	NA	NA	NA
	11/27/90*	0.013	<0.0005	<0.0005	<0.0005	NA	NA	NR	NR	1.2	0.037
	07/25/91*	0.00086	<0.0005	<0.0005	<0.0005	NA	NA	NR	NR	<0.05	<0.05
	06/25/93**	<0.0005	<0.0005	<0.0005	<0.0005	<5.0	NA	NR	NR	<0.05	<0.05
	11/30/93**	<0.0005	<0.0005	<0.0005	<0.0005	<5.0	NA	NA	NA	NA	NA
	03/15/94**	<0.0005	<0.0005	<0.0005	<0.0005	<0.5	NA	NA	NA	NA	NA
	07/22/94*	0.0030	<0.0005	<0.0005	<0.0005	NA	NA	NR	NR	<0.05	<0.05
	03/29/95	0.00070	<0.0005	<0.0005	<0.0015	NA	NA	NR	NR	<0.10	<0.05
	07/18/95*	0.0010	<0.001	<0.001	<0.002	NA	NA	NR	NR	<0.05	<0.05
	03/21/96	0.00079	<0.0005	<0.0005	<0.0015	NA	NA	NR	NR	<0.10	<0.1
	12/11/97	Abandoned									
MW-2	04/25/86	5.0	11.2	1.1	9.0	NA	NA	NA	NA	NA	38.0
	12/31/86	0.537	0.121	0.196	0.382	NA	NA	NA	NA	NA	3.578
	07/13/90*	0.550	0.010	ND	ND	NA	NA	NA	NA	NA	NA
	11/27/90*	0.330	0.034	0.033	0.028	NA	NA	NA	NA	1.7	0.930
	06/25/93**	0.100	<0.0005	<0.0005	<0.0005	<5.0	NA	NA	NA	<0.05	<0.05
	11/30/93**	0.240	0.0013	.02	ND	<5.0	NA	NA	NA	NA	NA
	03/15/94**	2.50	0.035	0.160	ND	NA	NA	NA	NA	NA	NA
	07/22/94*	0.680	0.011	0.048	0.012	0.70	NA	NA	NA	0.054	2.0
	03/29/95	0.230	0.0080	0.015	<0.0075	NA	NA	NA	NA	<0.10	1.2
	07/18/95*	0.440	0.0190	0.0420	0.0061	NA	NA	NA	NA	<0.050	1.4
	03/21/96	0.31	0.0088	0.024	<0.015	NA	NA	NA	NA	<0.10	1.3
	10/17/96*	0.420	<0.01	0.033	<0.03	NA	NA	NA	NA	0.44	<1.0
	12/11/97	Abandoned									

TABLE 2

SUMMARY OF GROUND WATER ANALYTICAL RESULTS

Former Beacon Truck Stop No. 652
Exit 359, Grant Road and Interstate 40
Lupton, Arizona

Well ID	Sample Date	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	Xylenes (mg/L)	TRPH (mg/L)	MTBE (mg/L)	EFH (C10-C22) (mg/L)	EFH (C22-C32) (mg/L)	TEFH (C10-C32) (mg/L)	VFH (mg/L)
MW-3	12/31/86	NA	NA	NA	NA	NA	NA	NR	NR	ND	NA
	07/13/90*	<0.0005	<0.0005	<0.0005	<0.0005	NA	NA	NR	NR	NA	NA
	11/27/90*	<0.0005	<0.0005	<0.0005	<0.0005	NA	NA	NR	NR	0.250	<0.020
	07/25/91*	<0.0005	<0.0005	<0.0005	<0.0005	NA	NA	NR	NR	<0.05	<0.05
	06/25/93**	<0.0005	<0.0005	<0.0005	<0.0005	<5.0	NA	NR	NR	<0.05	<0.05
	11/30/93**	<0.0005	<0.0005	<0.0005	<0.0005	<5.0	NA	NR	NR	NA	<0.05
	03/15/94**	<0.0005	<0.0005	<0.0005	<0.0005	<0.5	NA	NR	NR	NA	<0.05
	07/22/94*	<0.0005	<0.0005	<0.0005	<0.0005	NA	NA	NR	NR	<0.05	<0.05
	03/29/95	<0.0005	<0.0005	<0.0005	<0.0015	NA	NA	NR	NR	<0.10	<0.050
	07/18/95*	<0.0005	<0.001	<0.001	<0.002	NA	NA	NR	NR	<0.11	<0.01
	03/21/96*	<0.0005	<0.0005	<0.0005	<0.0015	NA	NA	NR	NR	<0.10	<0.05
	12/11/97	<0.0005	<0.0005	<0.0005	<0.0015	NA	NA	NR	NR	0.18	NA
	07/21/98	<0.001	<0.001	<0.001	<0.003	NA	NA	<0.25	0.71	0.71	<0.5
	12/17/98	<0.0005	<0.001	<0.001	<0.0015	NA	NA	<0.25	<0.25	<0.5	<0.2
	07/06/99	<0.0005	<0.001	<0.001	<0.0015	NA	NA	<0.25	<0.25	<0.5	<0.2
	12/16/99	<0.0005	<0.001	<0.001	<0.0015	NA	<0.005	<0.25	<0.25	<0.5	NA
	08/24/00	<0.0005	<0.001	<0.001	<0.0015	NA	<0.005	<0.25	<0.25	<0.5	<0.2
	12/19/00	<0.0005	<0.001	<0.001	<0.0015	NA	<0.005	<0.25	<0.25	<0.5	<0.2
	05/31/01	<0.0005	<0.001	<0.001	<0.0015	NA	<0.005	<0.25	<0.25	<0.5	<0.2

TABLE 2

SUMMARY OF GROUND WATER ANALYTICAL RESULTS

Former Beacon Truck Stop No. 652
Exit 359, Grant Road and Interstate 40
Lupton, Arizona

Well ID	Sample Date	Benzene (mg/L)	Toluene (mg/L)	Ethyl-benzene (mg/L)	Xylenes (mg/L)	TRPH (mg/L)	MTBE (mg/L)	EFH (C10-C22) (mg/L)	EFH (C22-C32) (mg/L)	TEFH (C10-C32) (mg/L)	VFH (mg/L)
MW-4	12/31/86	NA	NA	NA	NA	NA	NA	NA	NA	ND	NA
	07/13/90*	<0.0005	<0.0005	<0.0005	<0.0005	NA	NA	NA	NA	NA	NA
	11/27/90*	0.0023	0.0008	<0.0005	0.0006	NA	NA	NA	NA	0.350	0.047
	07/25/91*	0.00091	<0.0005	<0.0005	<0.0005	NA	NA	NA	NA	0.890	0.150
	06/25/93**	<0.0005	<0.0005	<0.0005	<0.0005	2.0	NA	NA	NA	20.05	<0.05
	11/30/93**	0.001	<0.0005	<0.0005	<0.0005	<5.0	NA	NA	NA	NA	NA
	03/15/94**	<0.0005	<0.0005	<0.0005	<0.0005	<0.5	NA	NA	NA	NA	NA
	07/22/94*	0.0026	0.0010	<0.0005	0.0013	NA	NA	NA	NA	0.390	0.250
	03/29/95	0.0055	<0.0005	<0.0005	<0.0015	NA	NA	NA	NA	<0.10	0.061
	07/18/95*	0.00250	<0.001	<0.001	<0.002	NA	NA	NA	NA	0.11	<0.1
	03/21/96*	0.0045	<0.0005	<0.0005	<0.0015	NA	NA	NA	NA	1.1	<0.05
	10/17/96*	0.0061	<0.0005	<0.0005	<0.0005	NA	NA	NA	NA	<0.10	0.079
	12/11/97	0.0028	<0.0005	<0.0005	<0.001	NA	NA	NA	NA	0.26	NA
	07/21/98	0.0058	<0.001	<0.001	<0.003	NA	NA	<0.25	0.28	<0.5	<0.5
	12/17/98	0.0015	<0.001	<0.001	<0.0015	NA	NA	<0.25	<0.25	<0.5	<0.2
	07/06/99	0.0012	<0.001	<0.001	0.0022	NA	NA	0.62	1.1	1.7	<0.2
	12/16/99	<0.0005	<0.001	<0.001	<0.0015	NA	<0.005	<0.25	0.45	<0.5	NA
	08/24/00	<0.0005	<0.001	<0.001	<0.0015	NA	<0.005	<0.25	<0.25	<0.5	<0.2
	12/19/00	0.0062	<0.001	<0.001	<0.0015	NA	<0.005	<0.25	<0.25	<0.5	<0.2
	05/31/01	0.0099	<0.001	<0.001	<0.0015	NA	0.0087	<0.25	<0.25	<0.5	<0.2

TABLE 2

SUMMARY OF GROUND WATER ANALYTICAL RESULTS

Former Beacon Truck Stop No. 652
Exit 359, Grant Road and Interstate 40
Lupton, Arizona

Well ID	Sample Date	Benzene (mg/L)	Toluene (mg/L)	Ethyl-benzene (mg/L)	Xylenes (mg/L)	TRPH (mg/L)	MTBE (mg/L)	EFH (C10-C22) (mg/L)	EFH (C22-C32) (mg/L)	TEFH (C10-C32) (mg/L)	VFH (mg/L)
MW-5	10/17/91	<0.0005	<0.0005	<0.0005	<0.0005	NA	NA	NR	NR	NA	<0.05
	06/25/93**	<0.0005	<0.0005	<0.0005	<0.0005	<0.5	NA	NR	NR	<0.05	<0.05
	11/30/93**	<0.0005	<0.0005	<0.0005	<0.0005	<0.5	NA	NR	NR	NA	NA
	03/14/94**	<0.0005	<0.0005	<0.0005	<0.0005	<0.5	NA	NR	NR	NA	NA
	07/22/94*	<0.0005	<0.0005	<0.0005	<0.0005	NA	NA	NR	NR	<0.05	ND
	03/30/95	<0.0005	<0.0005	<0.0005	<0.0015	NA	NA	NR	NR	<0.10	<0.05
	07/18/95*	<0.00030	<0.001	<0.0015	<0.002	NA	NA	NR	NR	<0.05	<0.05
	03/21/96*	<0.0005	<0.0005	<0.0005	<0.0015	NA	NA	NR	NR	<0.10	<0.05
	12/11/97	<0.0005	<0.0005	<0.0005	<0.0015	NA	NA	NR	NR	0.17	<0.0005
	07/21/98	<0.001	<0.001	<0.001	<0.003	NA	NA	<0.25	<0.25	<0.5	<0.5
	12/17/98	<0.0005	<0.001	<0.001	<0.0015	NA	NA	<0.25	0.26	<0.5	<0.2
	07/06/99	<0.0005	<0.001	<0.001	<0.0015	NA	NA	<0.25	<0.25	<0.5	<0.2
	12/16/99	<0.0005	<0.001	<0.001	<0.0015	NA	<0.005	<0.25	<0.25	<0.5	NA
	08/24/00	<0.0005	<0.001	<0.001	<0.0015	NA	0.0018	<0.25	<0.25	<0.5	<0.2
	12/19/00	<0.0005	<0.001	<0.001	<0.0015	NA	<0.005	<0.25	<0.25	<0.5	<0.2
	05/31/01	<0.0005	<0.001	<0.001	<0.0015	NA	<0.005	<0.25	<0.25	<0.5	<0.2

TABLE 2

SUMMARY OF GROUND WATER ANALYTICAL RESULTS

Former Beacon Truck Stop No. 652
Exit 359, Grant Road and Interstate 40
Lupton, Arizona

Well ID	Sample Date	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	Xylenes (mg/L)	TRPH (mg/L)	MTBE (mg/L)	EFH (C10-C22) (mg/L)	EFH (C22-C32) (mg/L)	TEFH (C10-C32) (mg/L)	VFH (mg/L)
MW-6	10/17/91	<0.0005	<0.0005	<0.0005	<0.0005	NA	NA	NR	NR	NA	0
	06/25/93**	<0.0005	<0.0005	<0.0005	<0.0005	<0.5	NA	NR	NR	<0.05	<0.05
	11/30/93**	<0.0005	<0.0005	<0.0005	<0.0005	<0.5	NA	NR	NR	NA	NA
	03/14/94**	<0.0005	<0.0005	<0.0005	<0.0005	<0.5	NA	NR	NR	NA	NA
	07/22/94*	0.00066	0.00059	<0.0005	0.0014	NA	NA	NR	NR	<0.05	0.15
	03/30/95	0.0067	<0.0005	<0.0005	<0.002	NA	NA	NR	NR	<0.10	0.12
	07/18/95*	0.0006	<0.001	<0.0003	<0.0005	NA	NA	NR	NR	<0.05	0.15
	03/21/96*	<0.0005	<0.0005	<0.0005	<0.0015	NA	NA	NR	NR	<0.10	0.091
	12/11/97	NS	NS	NS	NS	NS	NA	NS	NS	NS	NS
	07/21/98	NS	NS	NS	NS	NS	NA	NS	NS	NS	NS
	12/17/98	NS	NS	NS	NS	NS	NA	NS	NS	NS	NS
	07/06/99	NS	NS	NS	NS	NS	NA	NS	NS	NS	NS
	12/16/99	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
MW-7	08/24/00	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/19/00	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	05/31/01	<0.0005	<0.001	<0.001	<0.0015	NS	0.029	<0.25	<0.25	<0.5	<0.2
	03/29/95	<0.0005	<0.0005	<0.0005	<0.0015	NA	NA	NA	NA	<0.10	<0.05
	07/18/95*	<0.0005	<0.001	<0.001	<0.002	NA	NA	NA	NA	<0.05	<0.05
	03/21/96*	<0.0005	<0.0005	<0.0005	<0.0015	NA	NA	NA	NA	<0.10	<0.05
	12/11/97	NS	NS	NS	NS	NS	NA	NA	NA	NS	NS
	07/21/98	NS	NS	NS	NS	NS	NA	NS	NS	NS	NS
	07/06/99	NS	NS	NS	NS	NS	NA	NS	NS	NS	NS
	12/16/99	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	08/24/00	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/19/00	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	05/31/01	<0.0005	<0.001	<0.001	<0.0015	NS	<0.005	<0.25	<0.25	<0.5	<0.2

TABLE 2

SUMMARY OF GROUND WATER ANALYTICAL RESULTS

Former Beacon Truck Stop No. 652
Exit 359, Grant Road and Interstate 40
Lupton, Arizona

Well ID	Sample Date	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	Xylenes (mg/L)	TRPH (mg/L)	MTBE (mg/L)	EFH (C10-C22) (mg/L)	EFH (C22-C32) (mg/L)	TEFH (C10-C32) (mg/L)	VFH (mg/L)
MW-8	03/29/95	0.008	< 0.0005	< 0.0005	< 0.0015	NA	NA	NA	NA	< 0.10	< 0.05
	07/18/95*	0.015	0.001	< 0.001	0.002	NA	NA	NA	NA	< 0.05	0.075
	03/21/96*	0.013	0.0038	0.0013	< 0.0015	NA	NA	NA	NA	< 0.10	0.13
	10/17/96*	0.0093	0.004	0.0010	< 0.0015	NA	NA	NA	NA	< 0.10	0.065
	12/11/97	0.0064	0.00072	< 0.0005	< 0.0015	NA	NA	NA	NA	0.22	NA
	07/21/98	0.018	0.0048	< 0.001	< 0.003	NA	NA	< 0.25	< 0.25	< 0.5	< 0.5
	12/17/98	0.027	0.0051	0.0011	< 0.0015	NA	NA	< 0.25	< 0.25	< 0.5	< 0.2
	07/06/99	0.012	< 0.001	< 0.001	< 0.0015	NA	NA	< 0.25	< 0.25	< 0.5	< 0.2
	12/16/99	0.045	< 0.001	0.0016	0.0024	NA	< 0.005	< 0.25	< 0.25	< 0.5	NA
	08/24/00	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/19/00	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	05/31/01	0.011	< 0.001	< 0.001	< 0.0015	NS	< 0.005	< 0.25	< 0.25	< 0.5	< 0.2

TABLE 2

SUMMARY OF GROUND WATER ANALYTICAL RESULTS

Former Beacon Truck Stop No. 652
Exit 359, Grant Road and Interstate 40
Lupton, Arizona

Well ID	Sample Date	Benzene (mg/L)	Toluene (mg/L)	Ethyl-benzene (mg/L)	Xylenes (mg/L)	TRPH (mg/L)	MTBE (mg/L)	EFH (C10-C22) (mg/L)	EFH (C22-C32) (mg/L)	TEFH (C10-C32) (mg/L)	VFH (mg/L)
MW-9	03/29/95	< 0.0005	0.0020	< 0.00050	< 0.0015	NA	NA	NR	NR	< 0.10	< 0.050
	07/18/95*	< 0.0005	< 0.001	< 0.001	< 0.002	NA	NA	NR	NR	< 0.050	< 0.01
	03/21/96*	< 0.0005	< 0.0005	< 0.0005	< 0.0015	NA	NA	NR	NR	< 0.10	< 0.05
	12/11/97	< 0.0005	< 0.0005	< 0.0005	< 0.0015	NA	NA	NR	NR	0.20	NA
	07/21/98	< 0.001	< 0.001	< 0.001	< 0.003	NA	NA	< 0.25	< 0.25	< 0.5	< 0.5
	12/17/98	< 0.0005	< 0.001	< 0.001	< 0.0015	NA	NA	< 0.25	< 0.25	< 0.5	< 0.2
	07/06/99	< 0.0005	< 0.001	< 0.001	0.0022	NA	NA	< 0.25	< 0.25	< 0.5	< 0.2
	12/16/99	< 0.0005	< 0.001	< 0.001	< 0.0015	NA	< 0.005	< 0.25	< 0.25	< 0.5	NA
	08/24/00	< 0.0005	< 0.001	< 0.001	< 0.0015	NA	< 0.005	< 0.25	< 0.25	< 0.5	< 0.2
	12/19/00	< 0.0005	< 0.001	< 0.001	< 0.0015	NA	< 0.005	< 0.25	< 0.25	< 0.5	< 0.2
	05/31/01	< 0.0005	< 0.001	< 0.001	< 0.0015	NA	< 0.005	< 0.13	< 0.13	< 0.25	< 0.2
MCL		0.005	1	0.700	10	Not Established	Not Established	Not Established	Not Established	Not Established	Not Established

* = BTEX analyzed by EPA Method 8020/602

** = BTEX analyzed by EPA Method 502.2

TRPH = Total Recoverable petroleum hydrocarbons.

EFH = Extractable fuel hydrocarbons.

TEFH = Total extractable fuel hydrocarbons or total petroleum hydrocarbons as diesel.

VFH = Volatile fuel hydrocarbons or total petroleum hydrocarbons as gasoline.

mg/L = Milligrams per liter.

NA = Not analyzed.

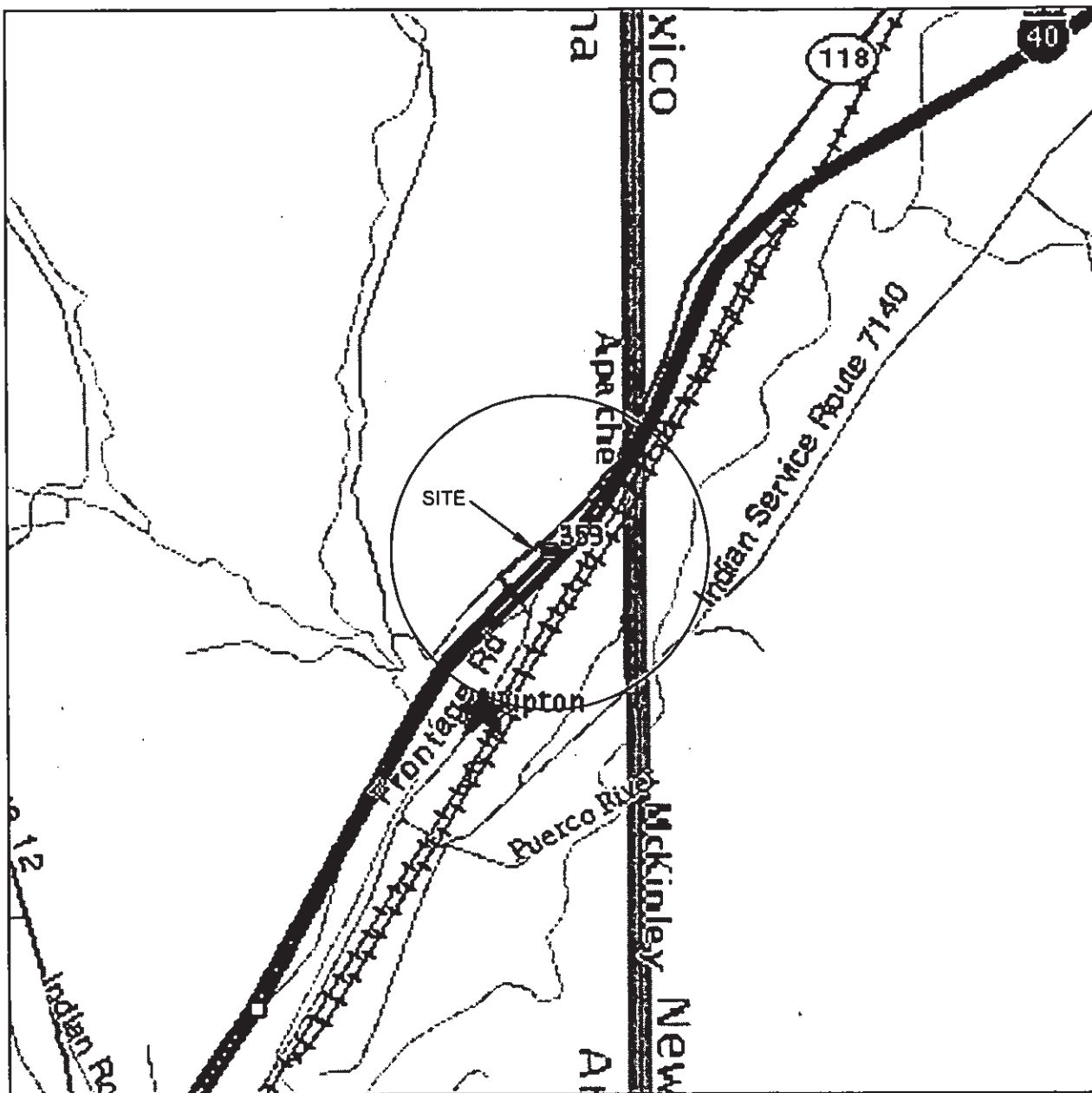
ND = Not detected.

NS = Not sampled.

NR = Not reported.

MCL = U.S. EPA Primary Maximum Contaminant Level

Note: All concentrations are in parts per million (ppm), expressed as milligrams per liter.



GENERAL NOTES:
BASE MAP FROM
MAPQUEST.COM
LUPTON, AZ. MAP



■ QUADRANGLE LOCATION

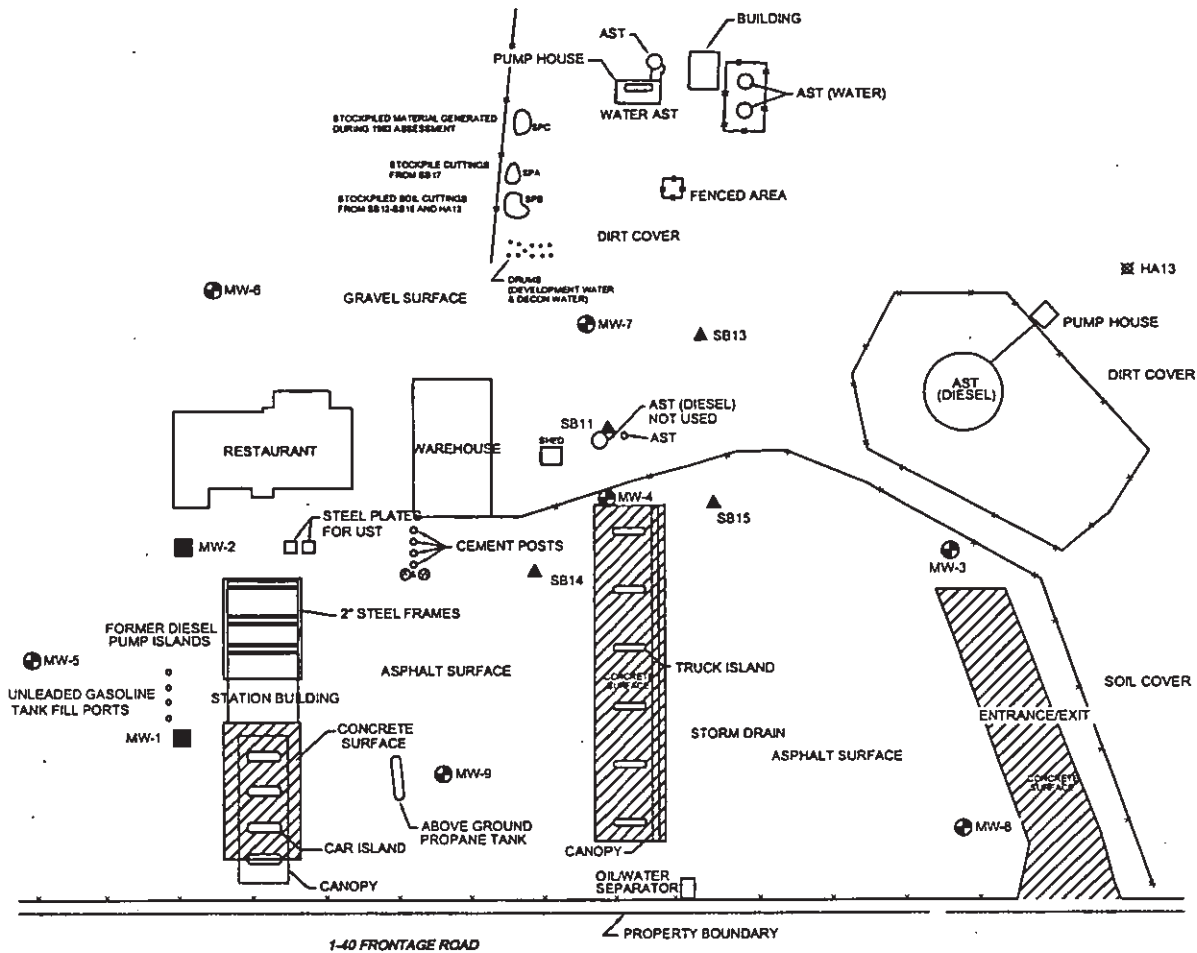


SCALE 1:24,000

FIGURE 1
SITE LOCATION MAP
BEACON TRUCK STOP #652
EXIT 359, GRANT ROAD AND I-40
LUPTON, ARIZONA

PROJECT NO. H093-103	DRAWN BY TLA 6/11/01
FILE NO. H0931031A	PREPARED BY TLA
REVISION NO. 2	REVIEWED BY





- LEGEND**
- ⊕ MW-3 MONITORING WELL LOCATION
 - MW-1 MONITORING WELL LOCATION
 - ▲ SB 12 SOIL BORING LOCATION AND IDENTIFICATION
 - ⊠ HA 13 HAND AUGER LOCATION AND IDENTIFICATION
 - Ⓐ AIR LINE
 - Ⓢ WATER LINE
 - UST UNDERGROUND STORAGE TANK
 - AST ABOVE GROUND STORAGE TANK
 - — — — — PROPERTY BOUNDARY
 - x — x — FENCE
 - ▨ CONCRETE SURFACE
 - 55 GALLON DRUM LOCATION

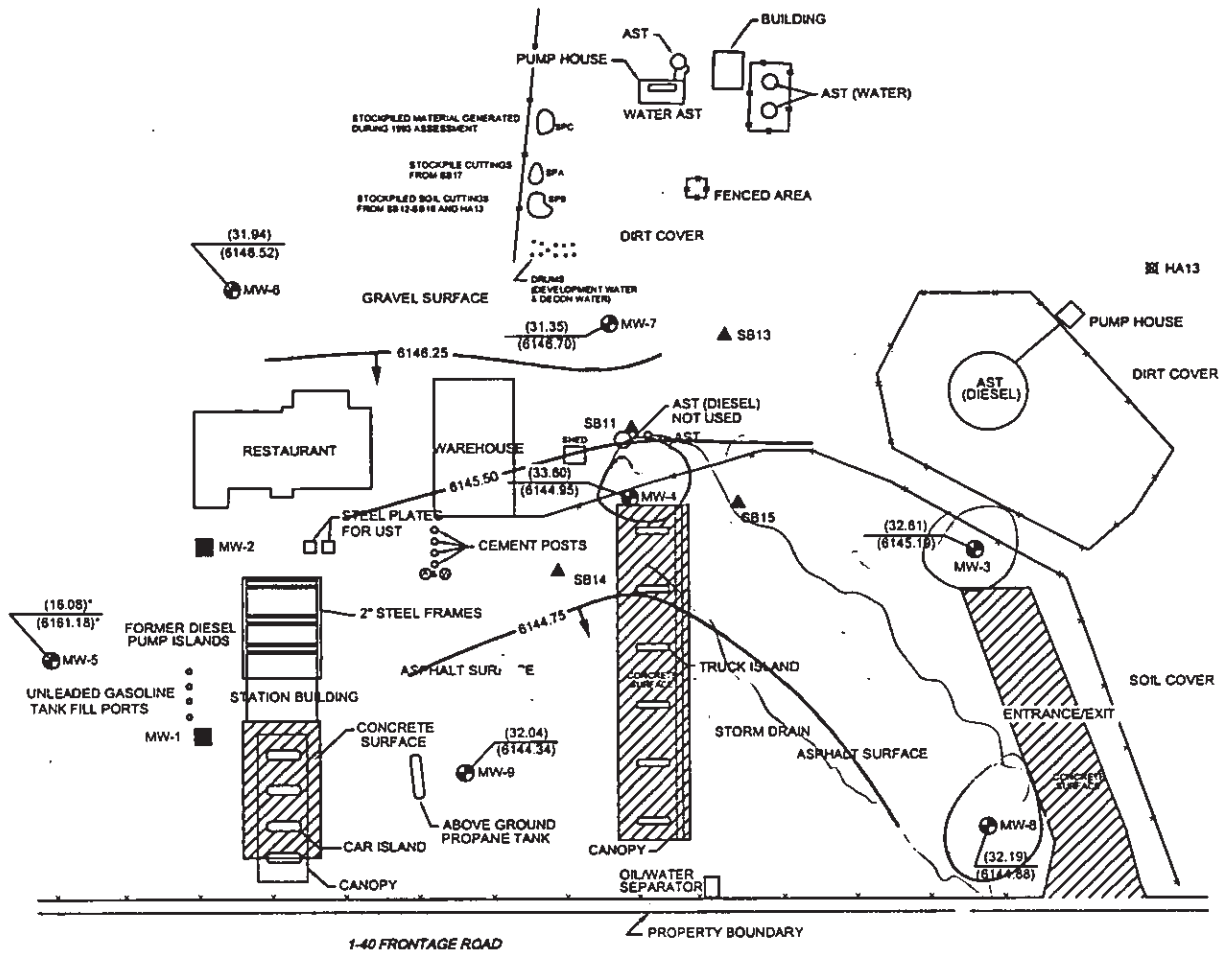


**FIGURE 2
SITE MAP**

**BEACON TRUCK STOP #652
EXIT 359, GRANT ROAD AND I-40
LUPTON, ARIZONA**

PROJECT NO. H093-103	DRAWN BY TLA 6/11/01
FILE NO. H0931031	PREPARED BY TLA
REVISION NO. 3	REVIEWED BY





LEGEND

- MW-3 MONITORING WELL LOCATION
- MW-1 MONITORING WELL LOCATION
- ▲ SB-12 SOIL BORING LOCATION AND IDENTIFICATION
- ⊗ HA-13 HAND AUGER LOCATION AND IDENTIFICATION
- ⊙ AIR LINE
- ⊙ WATER LINE
- UST UNDERGROUND STORAGE TANK
- AST ABOVE GROUND STORAGE TANK
- PROPERTY BOUNDARY
- FENCE
- ▨ CONCRETE SURFACE
- 55 GALLON DRUM LOCATION
- (32.61)
(6145.19) DEPTH TO GROUNDWATER (FEET BELOW TOP OF CASING)
GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL
- 6145.50 — WATER TABLE CONTOUR IN FEET RELATIVE
TO MEAN SEA LEVEL
- GROUND WATER FLOW DIRECTION
- NM NOT MEASURED
- GROUND WATER LEVEL NOT USED DUE TO ANOMALOUS
MEASUREMENT BECAUSE OF PERCHED AQUIFER

FIGURE 3
GROUND WATER ELEVATION CONTOUR MAP
FIRST HALF 2001 (5/31/01)
BEACON TRUCK STOP #652
EXIT 359, GRANT ROAD AND I-40
LUPTON, ARIZONA

PROJECT NO.
H093-103

FILE NO.
H0931031

REVISION NO.
1

DRAWN BY
TLA 6/11/01

PREPARED BY
TLA

REVIEWED BY



Delta
 Environmental
 Consultants, Inc.

ENCLOSURE A

Field Methods & Procedures and
Quality Assurance Plan

FIELD METHODS AND PROCEDURES

Beacon Station No. 652
Lupton, California

Health and Safety Plan

Fieldwork performed by Delta and Delta's subcontractors at the site is conducted according to guidelines established in a Site Health and Safety Plan (SHSP). The SHSP is a document, which describes the hazards that may be encountered in the field and specifies protective equipment, work procedures, and emergency information. A copy of the SHSP is at the site and available for reference by appropriate parties during work at the site.

Ground Water and Liquid-Phase Petroleum Hydrocarbon Depth Assessment

A water/hydrocarbon interface probe is used to assess free product thickness, if present, and a water level indicator is used to measure the ground water depth in monitoring wells that do not contain free product. Depth to ground water or free product is measured from a datum point at the top of each monitoring well casing. The datum point is typically a notch cut in the north side of the casing edge. If a water level indicator is used, the tip is subjectively analyzed for hydrocarbon sheen.

Subjective Analysis of Ground Water

Prior to purging, a water sample is collected from the monitoring well for subjective analysis. The sample is retrieved by gently lowering a clean, disposable bailer to approximately one-half the bailer length past the air/liquid interface. The bailer is then retrieved and the sample contained within the bailer is examined for floating product and the appearance of a product sheen.

Monitoring Well Purging and Sampling

Monitoring wells are purged using a pump or bailer until pH, temperature, and conductivity of the purge water has stabilized and a minimum of three well volumes of water has been removed. If three well volumes cannot be removed in one and one-half-hour's time, the well is allowed to recharge to 80 percent of original level. After recharging, a ground water sample is then removed from each of the wells using a disposable bailer. The water sample is collected, labeled and handled according to the Quality Assurance Plan. Water generated during the monitoring event is disposed of according to the regulatory accepted methods pertaining to the site.

FIELD METHODS AND PROCEDURES

Beacon Station No. 652
Lupton, California

General Sample Collection and Handling Procedures

Proper collection and handling are essential to ensure the quality of a sample. Each sample is collected in a suitable container, preserved correctly for the intended analysis and stored, prior to analysis, for no longer than the maximum allowable holding time. Details on the procedures for collection and handling of samples used on this project can be found in this section.

Water Sample Collection for Volatile Organic Analyses

For volatile organic analyses (VOA), the water sample is decanted into each VOA vial in such a manner that there is no meniscus at the top of the vial. A cap is quickly secured to the top of the vial. The vial is inverted and gently tapped to see if air bubbles are present. If none are present, the vial is labeled and refrigerated according to soil and water sample labeling and preservation.

Soil and Water Sample Labeling and Preservation

Label information includes a unique sample identification number, job identification number, date and time. After labeling, all soil and water samples are placed in a Ziploc® type bag and placed in an ice chest cooled to approximately 4° Celsius. Upon arriving at Delta's office, the samples are transferred to a locked refrigerator cooled to approximately 4° Celsius. Chemical preservation is controlled by the required analysis and is noted on the chain-of-custody form.

Upon recovery, the sample container is sealed to minimize the potential of volatilization and cross-contamination prior to chemical analysis. Soil sampling tubes are typically closed at each end with Teflon® sheeting and plastic caps. The sample is then placed in a Ziploc® type bag and sealed. The sample is labeled and refrigerated at approximately 4° C for delivery under strict chain-of-custody, to the analytical laboratory.

Sample Identification and Chain-of-Custody Procedures

Sample identification and chain-of-custody procedures document sample possession from the time of collection to ultimate disposal. Each sample container submitted for analysis has a label affixed to identify the job number, sampler, date and time of sample collection, and a sample number unique to that sample. This information, in addition to a description of the sample, field measurements made, sampling methodology, names of on-site personnel, and any other pertinent field observations is recorded on the borehole log or in the field records. A California-certified laboratory analyzes samples.

A chain-of-custody form is used to record possession of the sample from time of collection to its arrival at the laboratory. When the samples are shipped, the person in custody of them relinquishes the samples by signing the chain-of-custody form and noting the time. The sample-control officer at the laboratory verifies sample integrity and confirms that the samples are collected in the proper containers, preserved correctly, and contain adequate volumes for analysis.

If these conditions are met, each sample is assigned a unique log number for identification throughout analysis and reporting. The log number is recorded on the chain-of-custody form and in the legally required logbook maintained by the laboratory in the laboratory. The sample description, date received, client's name and other relevant information are also recorded.

ENCLOSURE B

Ground Water Sampling Information



Site Address: Exit 359, Grant Road & I-40
Site Name: Beacon 652

Sampled By: Ryan Eberle
Delta Project No.: H093-103

Date: 05/31/01

Purge Method:	<input type="checkbox"/> Pump	<input checked="" type="checkbox"/> Bailor	Sample Port	Depth to Bottom	Depth to Water	*Multiplier Values: (2" Well: 0.5) (4" Well: 2.0) (6" Well: 4.4)
*Casing Water Column:						

Sampling Notes:



3164 Gold Camp Drive, Suite 200
 Rancho Cordova, California 95670
 Direct: (916) 638-2085
 Fax: (916) 638-8385

Site Address: Exit 359, Grant Road & I-40
 Lupton, Arizona
 Sampled By: Ryan Eberle

Site Name: Beacon 652
 Delta Project No.: H093-103
 Date: 05/31/01

Well ID	Time	Temp °C	pH Units	Sp. Cond.	Gallons	Well ID	Time	Temp °C	pH Units	Sp. Cond.	Gallons
MW-3	15:06	68.2	7.46	311	9						
	15:15	65.3	7.45	285	9						
	15:22	62.3	7.56	277	4						
				Dry at:	26						
MW-4	14:19	67.9	6.84	949	7						
	14:27	64.3	6.92	938	7						
	14:34	67.3	7.01	956	2						
				Dry at:	23						
MW-5	12:19	73.6	7.04	528	0.5						
	12:23	68.2	7.15	382	1.0						
				Dry at:	2						
MW-6	12:40	71.7	7.06	640	0.5						
	12:43	67.5	7.05	613	0.5						
	12:46	67.0	7.07	612	0.5						
					2						
MW-7	17:15	67.6	7.08	430	11						
	17:34	64.6	7.09	382	11						
	17:49	63.1	7.24	339	13						
					35						
MW-8	16:15	70.1	7.09	493	10						
	16:25	62.9	7.11	476	10						
	16:38	63.7	7.20	409	10						
				Dry at:	34						
MW-9	13:30	66.2	7.21	622	7						
	13:39	66.0	7.26	635	7						
	13:44	65.1	7.25	606	3						
				Dry at:	26						

Sampling Notes:

TLA (652-QMR1)

(Page 2 of 2)

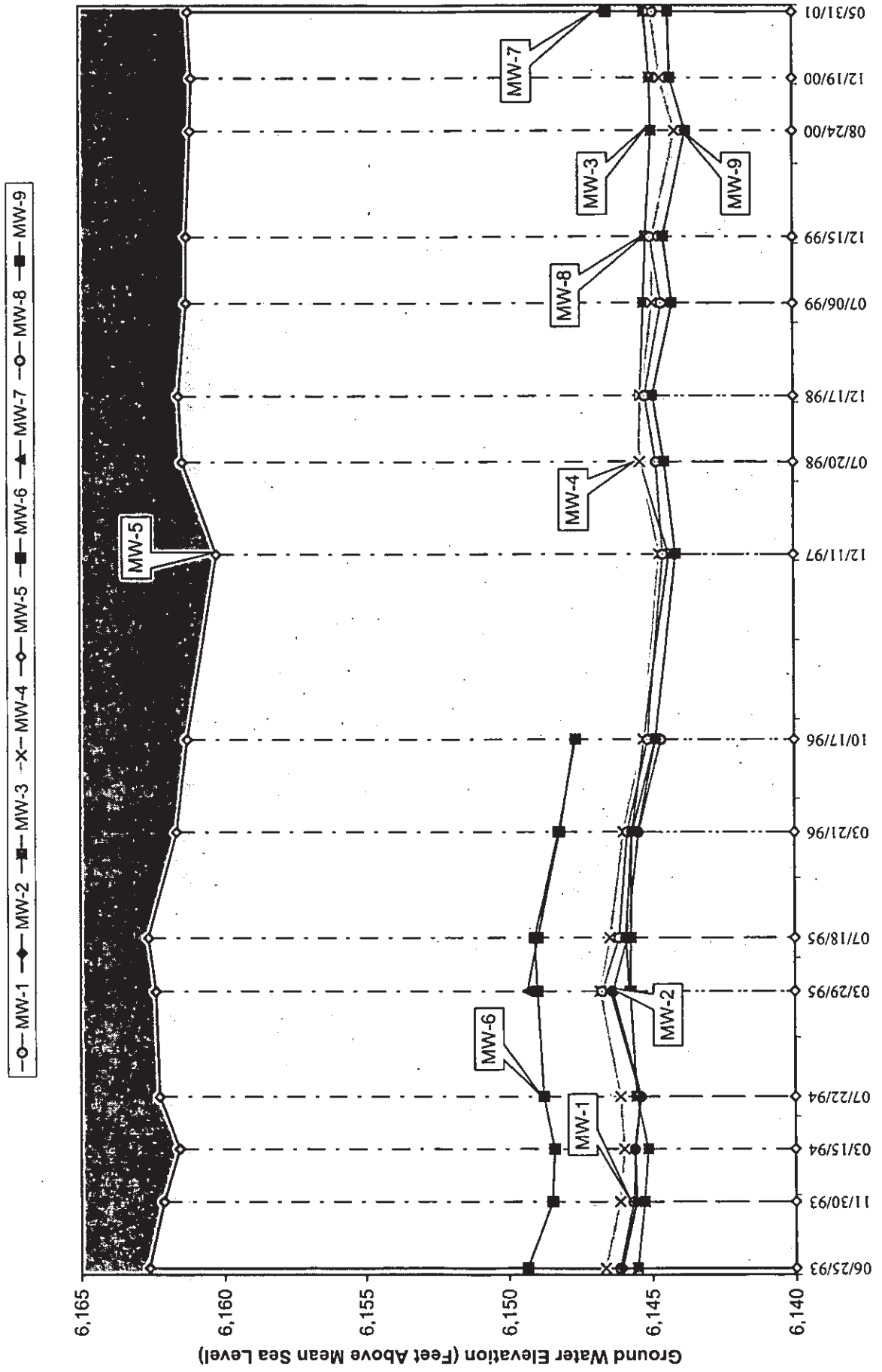
Last Printed: 6/12/01

ENCLOSURE C

Hydrograph for
Monitoring Wells MW-1 through MW-9

Former Beacon Truck Stop No. 652
Exit 359, Grant Road and Interstate 40
Lupton, Arizona

Hydrograph



ENCLOSURE D

Ground Water Monitoring
Analytical Results



Delta Environ. Consultants
3164 Goldcamp Dr. Suite 200
Rancho Cordova, CA 95670-6021
Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01

Received: 06/01/01

Issued: 06/08/01-07/20/01

CASE NARRATIVE

LABORATORY NUMBER

PKF0007-01
PKF0007-01RE1
PKF0007-02
PKF0007-02RE1
PKF0007-03
PKF0007-03RE1
PKF0007-04
PKF0007-04RE1
PKF0007-05
PKF0007-05RE1
PKF0007-06
PKF0007-06RE1
PKF0007-07
PKF0007-07RE1
PKF0007-08

SAMPLE DESCRIPTION

MW-6
MW-6
MW-5
MW-5
MW-9
MW-9
MW-4
MW-4
MW-3
MW-3
MW-8
MW-8
MW-7
MW-7
Trip Blank

SAMPLE MATRIX

Water
Water
Water
Water
Water
Water
Water
Water
Water
Water
Water
Water
Water
Water
Water

SAMPLE RECEIPT: Samples were received intact, on ice, and with chain of custody documentation.

HOLDING TIMES: Holding times were met.

PRESERVATION: Samples requiring preservation were verified prior to sample analysis.

OBSERVATIONS: No significant observations were made.

SUBCONTRACTED: No analyses were subcontracted to an outside laboratory.

QA/QC CRITERIA: All analyses met method criteria.

EXPLANATION OF
DATA QUALIFIERS: No further explanation of data qualifiers needed.

DEL MAR ANALYTICAL, PHOENIX (AZ0426)

Nicole Beck
Project Manager

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PKF0007
Page 1 of 17



Delta Environ. Consultants
 3164 Goldcamp Dr. Suite 200
 Rancho Cordova, CA 95670-6021
 Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01

Received: 06/01/01

EXTRACTABLE FUEL HYDROCARBONS (EPA 3510/8015B)

Analyte	Method	Batch	Reporting Limit mg/l	Sample Result mg/l	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
Sample ID: PKF0007-01RE1 (MW-6 - Water)								
DRO (C10-C22)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
ORO (C22-C32)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
Total (C10-C32)	EPA 8015 MOD.	P1F0705	0.50	ND	1	6/6/01	6/7/01	
Surrogate: n-Docosane (70-130%)				101 %				
Sample ID: PKF0007-02RE1 (MW-5 - Water)								
DRO (C10-C22)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
ORO (C22-C32)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
Total (C10-C32)	EPA 8015 MOD.	P1F0705	0.50	ND	1	6/6/01	6/7/01	
Surrogate: n-Docosane (70-130%)				112 %				
Sample ID: PKF0007-03RE1 (MW-9 - Water)								
DRO (C10-C22)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
ORO (C22-C32)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
Total (C10-C32)	EPA 8015 MOD.	P1F0705	0.50	ND	1	6/6/01	6/7/01	
Surrogate: n-Docosane (70-130%)				95.5 %				
The reporting limit for this sample was adjusted by a factor of 0.5 to account for the applicable preparation factor.								
Sample ID: PKF0007-04RE1 (MW-4 - Water)								
DRO (C10-C22)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
ORO (C22-C32)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
Total (C10-C32)	EPA 8015 MOD.	P1F0705	0.50	ND	1	6/6/01	6/7/01	
Surrogate: n-Docosane (70-130%)				102 %				
Sample ID: PKF0007-05RE1 (MW-3 - Water)								
DRO (C10-C22)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
ORO (C22-C32)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
Total (C10-C32)	EPA 8015 MOD.	P1F0705	0.50	ND	1	6/6/01	6/7/01	
Surrogate: n-Docosane (70-130%)				113 %				



Delta Environ. Consultants
3164 Goldcamp Dr. Suite 200
Rancho Cordova, CA 95670-6021
Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01

Received: 06/01/01

EXTRACTABLE FUEL HYDROCARBONS (EPA 3510/8015B)

Analyte	Method	Batch	Reporting Limit mg/l	Sample Result mg/l	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
Sample ID: PKF0007-06RE1 (MW-8 - Water)								
DRO (C10-C22)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
ORO (C22-C32)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
Total (C10-C32)	EPA 8015 MOD.	P1F0705	0.50	ND	1	6/6/01	6/7/01	
Surrogate: n-Docosane (70-130%)				84.2 %				
Sample ID: PKF0007-07RE1 (MW-7 - Water)								
DRO (C10-C22)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
ORO (C22-C32)	EPA 8015 MOD.	P1F0705	0.25	ND	1	6/6/01	6/7/01	
Total (C10-C32)	EPA 8015 MOD.	P1F0705	0.50	ND	1	6/6/01	6/7/01	
Surrogate: n-Docosane (70-130%)				110 %				

DEL MAR ANALYTICAL, PHOENIX (AZ0426

Nicole Beck
Project Manager

PKF0007
Page 3 of 17

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Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01

Received: 06/01/01

VOLATILE FUEL HYDROCARBONS (EPA 8015B)

Analyte	Method	Batch	Reporting Limit mg/l	Sample Result mg/l	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
Sample ID: PKF0007-01 (MW-6 - Water)								
Volatile Fuel Hydrocarbons	EPA 8015B	P1F0409	0.20	ND	1	6/4/01	6/5/01	
Surrogate: 4-BFB (FID) (60-120%)				92.0 %				
Sample ID: PKF0007-02 (MW-5 - Water)								
Volatile Fuel Hydrocarbons	EPA 8015B	P1F0704	0.20	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (FID) (60-120%)				86.5 %				
Sample ID: PKF0007-03 (MW-9 - Water)								
Volatile Fuel Hydrocarbons	EPA 8015B	P1F0704	0.20	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (FID) (60-120%)				87.5 %				
Sample ID: PKF0007-04 (MW-4 - Water)								
Volatile Fuel Hydrocarbons	EPA 8015B	P1F0704	0.20	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (FID) (60-120%)				89.0 %				
Sample ID: PKF0007-05 (MW-3 - Water)								
Volatile Fuel Hydrocarbons	EPA 8015B	P1F0704	0.20	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (FID) (60-120%)				93.0 %				
Sample ID: PKF0007-06 (MW-8 - Water)								
Volatile Fuel Hydrocarbons	EPA 8015B	P1F0704	0.20	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (FID) (60-120%)				88.0 %				
Sample ID: PKF0007-07 (MW-7 - Water)								
Volatile Fuel Hydrocarbons	EPA 8015B	P1F0704	0.20	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (FID) (60-120%)				89.5 %				

Nicole Beck
Project Manager

PKF0007
Page 4 of 17

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Rancho Cordova, CA 95670-6021
Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01

Received: 06/01/01

VOLATILE FUEL HYDROCARBONS (EPA 8015B)

Analyte	Method	Batch	Reporting Limit mg/l	Sample Result mg/l	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
Sample ID: PKF0007-08 (Trip Blank - Water)								
Volatile Fuel Hydrocarbons	EPA 8015B	P1F0704	0.20	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (FID) (60-120%)				89.0 %				

DEL MAR ANALYTICAL, PHOENIX (AZ0426

Nicole Beck
Project Manager

PKF0007
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 3164 Goldcamp Dr. Suite 200
 Rancho Cordova, CA 95670-6021
 Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01
 Received: 06/01/01

BTEX (EPA 8021B)

Analyte	Method	Batch	Reporting Limit ug/l	Sample Result ug/l	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
Sample ID: PKF0007-01 (MW-6 - Water)								
Benzene	EPA 8021B	P1F0409	0.50	ND	1	6/4/01	6/5/01	
Toluene	EPA 8021B	P1F0409	1.0	ND	1	6/4/01	6/5/01	
Ethylbenzene	EPA 8021B	P1F0409	1.0	ND	1	6/4/01	6/5/01	
Total Xylenes	EPA 8021B	P1F0409	1.5	ND	1	6/4/01	6/5/01	
Surrogate: 4-BFB (PID) (75-130%)				96.0 %				
Sample ID: PKF0007-02 (MW-5 - Water)								
Benzene	EPA 8021B	P1F0704	0.50	ND	1	6/7/01	6/7/01	
Toluene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Ethylbenzene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Total Xylenes	EPA 8021B	P1F0704	1.5	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (75-130%)				101 %				
Sample ID: PKF0007-03 (MW-9 - Water)								
Benzene	EPA 8021B	P1F0704	0.50	ND	1	6/7/01	6/7/01	
Toluene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Ethylbenzene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Total Xylenes	EPA 8021B	P1F0704	1.5	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (75-130%)				100 %				
Sample ID: PKF0007-04 (MW-4 - Water)								
Benzene	EPA 8021B	P1F0704	0.50	9.9	1	6/7/01	6/7/01	
Toluene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Ethylbenzene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Total Xylenes	EPA 8021B	P1F0704	1.5	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (75-130%)				97.5 %				

Nicole Beck
 Project Manager

PKF0007
 Page 6 of 17



Delta Environ. Consultants
 3164 Goldcamp Dr. Suite 200
 Rancho Cordova, CA 95670-6021
 Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01

Received: 06/01/01

BTEX (EPA 8021B)

Analyte	Method	Batch	Reporting Limit ug/l	Sample Result ug/l	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
Sample ID: PKF0007-05 (MW-3 - Water)								
Benzene	EPA 8021B	P1F0704	0.50	ND	1	6/7/01	6/7/01	
Toluene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Ethylbenzene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Total Xylenes	EPA 8021B	P1F0704	1.5	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (75-130%)				99.5 %				
Sample ID: PKF0007-06 (MW-8 - Water)								
Benzene	EPA 8021B	P1F0704	0.50	11	1	6/7/01	6/7/01	
Toluene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Ethylbenzene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Total Xylenes	EPA 8021B	P1F0704	1.5	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (75-130%)				99.0 %				
Sample ID: PKF0007-07 (MW-7 - Water)								
Benzene	EPA 8021B	P1F0704	0.50	ND	1	6/7/01	6/7/01	
Toluene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Ethylbenzene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Total Xylenes	EPA 8021B	P1F0704	1.5	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (75-130%)				100 %				
Sample ID: PKF0007-08 (Trip Blank - Water)								
Benzene	EPA 8021B	P1F0704	0.50	ND	1	6/7/01	6/7/01	
Toluene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Ethylbenzene	EPA 8021B	P1F0704	1.0	ND	1	6/7/01	6/7/01	
Total Xylenes	EPA 8021B	P1F0704	1.5	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (75-130%)				102 %				

DEL MAR ANALYTICAL, PHOENIX (AZ0426

Nicole Beck
 Project Manager

PKF0007
 Page 7 of 17

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Delta Environ. Consultants
3164 Goldcamp Dr. Suite 200
Rancho Cordova, CA 95670-6021
Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103
Report Number: PKF0007

Sampled: 05/31/01
Received: 06/01/01

MTBE (EPA 8021B MOD.)

Analyte	Method	Batch	Reporting Limit ug/l	Sample Result ug/l	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
Sample ID: PKF0007-01 (MW-6 - Water)								
Methyl-tert-butyl Ether (MTBE)	EPA 8021B	P1F0409	5.0	29	1	6/4/01	6/5/01	
Surrogate: 4-BFB (PID) (65-115%)				96.0 %				
Sample ID: PKF0007-02 (MW-5 - Water)								
Methyl-tert-butyl Ether (MTBE)	EPA 8021B	P1F0704	5.0	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (65-115%)				101 %				
Sample ID: PKF0007-03 (MW-9 - Water)								
Methyl-tert-butyl Ether (MTBE)	EPA 8021B	P1F0704	5.0	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (65-115%)				100 %				
Sample ID: PKF0007-04 (MW-4 - Water)								
Methyl-tert-butyl Ether (MTBE)	EPA 8021B	P1F0704	5.0	8.7	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (65-115%)				97.5 %				
Sample ID: PKF0007-05 (MW-3 - Water)								
Methyl-tert-butyl Ether (MTBE)	EPA 8021B	P1F0704	5.0	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (65-115%)				99.5 %				
Sample ID: PKF0007-06 (MW-8 - Water)								
Methyl-tert-butyl Ether (MTBE)	EPA 8021B	P1F0704	5.0	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (65-115%)				99.0 %				
Sample ID: PKF0007-07 (MW-7 - Water)								
Methyl-tert-butyl Ether (MTBE)	EPA 8021B	P1F0704	5.0	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (65-115%)				100 %				

Nicole Beck
Project Manager

PKF0007
Page 8 of 17

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Delta Environ. Consultants
3164 Goldcamp Dr. Suite 200
Rancho Cordova, CA 95670-6021
Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01

Received: 06/01/01

MTBE (EPA 8021B MOD.)

Analyte	Method	Batch	Reporting Limit ug/l	Sample Result ug/l	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
Sample ID: PKF0007-08 (Trip Blank - Water)								
Methyl-tert-butyl Ether (MTBE)	EPA 8021B	P1F0704	5.0	ND	1	6/7/01	6/7/01	
Surrogate: 4-BFB (PID) (65-115%)								
102 %								

DEL MAR ANALYTICAL, PHOENIX (AZ0426

Nicole Beck
Project Manager

PKF0007
Page 9 of 17

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Delta Environ. Consultants
 3164 Goldcamp Dr. Suite 200
 Rancho Cordova, CA 95670-6021
 Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01

Received: 06/01/01

METHOD BLANK/QC DATA

EXTRACTABLE FUEL HYDROCARBONS (EPA 3510/8015B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Data Qualifiers
Batch: P1F0705 Extracted: 06/07/01										
Blank Analyzed: 06/07/01 (P1F0705-BLK1)										
DRO (C10-C22)	ND	0.25	mg/l							
DRO (C22-C32)	ND	0.25	mg/l							
Total (C10-C32)	ND	0.50	mg/l							
Surrogate: n-Docosane	0.418		mg/l	0.400		104	70-130			
LCS Analyzed: 06/07/01 (P1F0705-BS1)										
DRO (C10-C22)	1.82	0.25	mg/l	2.00		91.0	50-130			
DRO (C22-C32)	1.73	0.25	mg/l	2.00		86.5	60-130			
Surrogate: n-Docosane	0.494		mg/l	0.400		124	70-130			
LCS Dup Analyzed: 06/07/01 (P1F0705-BSD1)										
DRO (C10-C22)	1.72	0.25	mg/l	2.00		86.0	50-130	5.65	20	
DRO (C22-C32)	1.69	0.25	mg/l	2.00		84.5	60-130	2.34	20	
Surrogate: n-Docosane	0.469		mg/l	0.400		117	70-130			



Delta Environ. Consultants
 3164 Goldcamp Dr. Suite 200
 Rancho Cordova, CA 95670-6021
 Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01
 Received: 06/01/01

METHOD BLANK/QC DATA

VOLATILE FUEL HYDROCARBONS (EPA 8015B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Data Qualifiers
Batch: P1F0409 Extracted: 06/04/01										
Blank Analyzed: 06/05/01 (P1F0409-BLK1)										
Volatiles Fuel Hydrocarbons	ND	0.20	mg/l							
Surrogate: 4-BFB (FID)	0.0171		mg/l	0.0200		85.5	60-120			
LCS Analyzed: 06/05/01 (P1F0409-BS2)										
Volatiles Fuel Hydrocarbons	0.945	0.20	mg/l	1.00		94.5	65-115			
Surrogate: 4-BFB (FID)	0.0228		mg/l	0.0200		114	60-120			
Duplicate Analyzed: 06/05/01 (P1F0409-DUP1)					Source: PKE0519-02					
Volatiles Fuel Hydrocarbons	ND	0.20	mg/l		ND				20	
Surrogate: 4-BFB (FID)	0.0175		mg/l	0.0200		87.5	60-120			
Matrix Spike Analyzed: 06/05/01 (P1F0409-MS2)					Source: PKE0519-02					
Volatiles Fuel Hydrocarbons	0.931	0.20	mg/l	1.00	ND	93.1	55-125			
Surrogate: 4-BFB (FID)	0.0218		mg/l	0.0200		109	60-120			
Batch: P1F0704 Extracted: 06/07/01										
Blank Analyzed: 06/07/01 (P1F0704-BLK1)										
Volatiles Fuel Hydrocarbons	ND	0.20	mg/l							
Surrogate: 4-BFB (FID)	0.0176		mg/l	0.0200		88.0	60-120			
LCS Analyzed: 06/07/01 (P1F0704-BS2)										
Volatiles Fuel Hydrocarbons	0.957	0.20	mg/l	1.00		95.7	65-115			
Surrogate: 4-BFB (FID)	0.0234		mg/l	0.0200		117	60-120			
Duplicate Analyzed: 06/07/01 (P1F0704-DUP1)					Source: PKF0007-02					
Volatiles Fuel Hydrocarbons	ND	0.20	mg/l		ND				20	
Surrogate: 4-BFB (FID)	0.0178		mg/l	0.0200		89.0	60-120			

Nicole Beck
 Project Manager

PKF0007
 Page 11 of 17



Delta Environ. Consultants
3164 Goldcamp Dr. Suite 200
Rancho Cordova, CA 95670-6021
Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103
Report Number: PKF0007

Sampled: 05/31/01
Received: 06/01/01

METHOD BLANK/QC DATA

VOLATILE FUEL HYDROCARBONS (EPA 8015B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC Limits	RPD	RPD Limit	Data Qualifiers
Batch: P1F0704 Extracted: 06/07/01									
Matrix Spike Analyzed: 06/07/01 (P1F0704-MS2)					Source: PKF0007-02				
Volatile Fuel Hydrocarbons	0.940	0.20	mg/l	1.00	ND	94.0	55-125		
Surrogate: 4-BFB (FID)	0.0227		mg/l	0.0200		114	60-120		



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 Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01
 Received: 06/01/01

METHOD BLANK QC DATA

BTEX (EPA 8021B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Data Qualifiers
Batch: P1F0409 Extracted: 06/04/01										
Blank Analyzed: 06/05/01 (P1F0409-BLK1)										
Benzene	ND	0.50	ug/l							
Toluene	ND	1.0	ug/l							
Ethylbenzene	ND	1.0	ug/l							
Total Xylenes	ND	1.5	ug/l							
Surrogate: 4-BFB (PID)	19.9		ug/l	20.0		99.5	75-130			
LCS Analyzed: 06/05/01 (P1F0409-BS1)										
Benzene	21.1	0.50	ug/l	20.0		106	80-115			
Toluene	19.8	1.0	ug/l	20.0		99.0	75-115			
Ethylbenzene	20.8	1.0	ug/l	20.0		104	80-120			
Total Xylenes	61.3	1.5	ug/l	60.0		102	80-120			
Surrogate: 4-BFB (PID)	20.5		ug/l	20.0		102	75-130			
Duplicate Analyzed: 06/05/01 (P1F0409-DUP1)										
Benzene	ND	0.50	ug/l		ND				20	
Toluene	ND	1.0	ug/l		ND			1.53	20	
Ethylbenzene	ND	1.0	ug/l		ND				20	
Total Xylenes	ND	1.5	ug/l		ND			1.45	20	
Surrogate: 4-BFB (PID)	19.8		ug/l	20.0		99.0	75-130			
Matrix Spike Analyzed: 06/05/01 (P1F0409-MS1)										
Benzene	21.8	0.50	ug/l	20.0	ND	109	75-115			
Toluene	20.4	1.0	ug/l	20.0	ND	101	70-115			
Ethylbenzene	21.3	1.0	ug/l	20.0	ND	106	75-120			
Total Xylenes	63.7	1.5	ug/l	60.0	ND	105	80-120			
Surrogate: 4-BFB (PID)	20.6		ug/l	20.0		103	75-130			

Nicole Beck
 Project Manager

PKF0007
 Page 13 of 17



Delta Environ. Consultants
 3164 Goldcamp Dr. Suite 200
 Rancho Cordova, CA 95670-6021
 Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01
 Received: 06/01/01

METHOD BLANK/QC DATA

BTEX (EPA 8021B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Data Qualifiers
Batch: P1F0704 Extracted: 06/07/01										
Blank Analyzed: 06/07/01 (P1F0704-BLK1)										
Benzene	ND	0.50	ug/l							
Toluene	ND	1.0	ug/l							
Ethylbenzene	ND	1.0	ug/l							
Total Xylenes	ND	1.5	ug/l							
Surrogate: 4-BFB (PID)	20.1		ug/l	20.0		100	75-130			
LCS Analyzed: 06/07/01 (P1F0704-BS1)										
Benzene	19.9	0.50	ug/l	20.0		99.5	80-115			
Toluene	20.2	1.0	ug/l	20.0		101	75-115			
Ethylbenzene	21.0	1.0	ug/l	20.0		105	80-120			
Total Xylenes	64.5	1.5	ug/l	60.0		108	80-120			
Surrogate: 4-BFB (PID)	21.5		ug/l	20.0		108	75-130			
Duplicate Analyzed: 06/07/01 (P1F0704-DUP1)										
					Source: PKF0007-02					
Benzene	ND	0.50	ug/l		ND				20	
Toluene	ND	1.0	ug/l		ND				20	
Ethylbenzene	ND	1.0	ug/l		ND				20	
Total Xylenes	ND	1.5	ug/l		ND				20	
Surrogate: 4-BFB (PID)	19.8		ug/l	20.0		99.0	75-130			
Matrix Spike Analyzed: 06/07/01 (P1F0704-MS1)										
					Source: PKF0007-02					
Benzene	20.1	0.50	ug/l	20.0	ND	100	75-115			
Toluene	20.4	1.0	ug/l	20.0	ND	102	70-115			
Ethylbenzene	21.1	1.0	ug/l	20.0	ND	106	75-120			
Total Xylenes	63.1	1.5	ug/l	60.0	ND	105	80-120			
Surrogate: 4-BFB (PID)	20.4		ug/l	20.0		102	75-130			

Nicole Beck
 Project Manager

PKF0007
 Page 14 of 17



Delta Environ. Consultants
 3164 Goldcamp Dr. Suite 200
 Rancho Cordova, CA 95670-6021
 Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01

Received: 06/01/01



MTBE (EPA 8021B MOD.)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Data Qualifiers
Batch: P1F0409 Extracted: 06/04/01										
Blank Analyzed: 06/05/01 (P1F0409-BLK1)										
tert-butyl Ether (MTBE)	ND	5.0	ug/l							
Surrogate: 4-BFB (PID)	19.9		ug/l	20.0		99.5	65-115			
CS Analyzed: 06/05/01 (P1F0409-BS1)										
tert-butyl Ether (MTBE)	19.4	5.0	ug/l	20.0		97.0	70-130			
Surrogate: 4-BFB (PID)	20.5		ug/l	20.0		102	65-115			
Duplicate Analyzed: 06/05/01 (P1F0409-DUP1)										
tert-butyl Ether (MTBE)	ND	5.0	ug/l		ND			11.8	20	
Surrogate: 4-BFB (PID)	19.8		ug/l	20.0		99.0	65-115			
Matrix Spike Analyzed: 06/05/01 (P1F0409-MS1)										
tert-butyl Ether (MTBE)	24.7	5.0	ug/l	20.0	ND	108	70-130			
Surrogate: 4-BFB (PID)	20.6		ug/l	20.0		103	65-115			
Batch: P1F0704 Extracted: 06/07/01										
Blank Analyzed: 06/07/01 (P1F0704-BLK1)										
tert-butyl Ether (MTBE)	ND	5.0	ug/l							
Surrogate: 4-BFB (PID)	20.1		ug/l	20.0		100	65-115			
CS Analyzed: 06/07/01 (P1F0704-BS1)										
tert-butyl Ether (MTBE)	17.0	5.0	ug/l	20.0		85.0	70-130			
Surrogate: 4-BFB (PID)	21.5		ug/l	20.0		108	65-115			
Duplicate Analyzed: 06/07/01 (P1F0704-DUP1)										
tert-butyl Ether (MTBE)	ND	5.0	ug/l		ND				20	
Surrogate: 4-BFB (PID)	19.8		ug/l	20.0		99.0	65-115			

Nicole Beck
 Project Manager

PKF0007
 Page 15 of 17



Delta Environ. Consultants
3164 Goldcamp Dr. Suite 200
Rancho Cordova, CA 95670-6021
Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01
Received: 06/01/01



MTBE (EPA 8021B MOD.)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC Limits	RPD	RPD Limit	Data Qualifiers
Batch: P1F0704 Extracted: 06/07/01									
Matrix Spike Analyzed: 06/07/01 (P1F0704-MS1)					Source: PKF0007-02				
Methyl-tert-butyl Ether (MTBE)	20.5	5.0	ug/l	20.0	ND	102	70-130		
Surrogate: 4-BFB (PID)	20.4		ug/l	20.0		102	65-115		



Delta Environ. Consultants
3164 Goldcamp Dr. Suite 200
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Attention: Mike Berrington

Client Project ID: Beacon Station 652 H093-103

Report Number: PKF0007

Sampled: 05/31/01

Received: 06/01/01



DATA QUALIFIERS AND DEFINITIONS

ND Analyte NOT DETECTED at or above the reporting limit
NR Not reported.
RPD Relative Percent Difference

Nicole Beck
Project Manager

PKF0007
Page 17 of 17

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Ultrasmar Inc.

CHAIN OF CUSTODY REPORT

BEACON

Beacon Station No.	652	Sampler (Print Name)		Date		Form No.	
Project No.	H093-103	Sampler (Signature)		5/31/01		1 of 1	
Project Location	Lupton, AZ	Affiliation		Standard T.A.T.		Direct Bill to	
Sample No./Identification		Date	Time	Lab No.	UltraMar		
MW-6		5/31/01	12:51		Rob Fishburn		
MW-5			13:10		REMARKS Hanford, CA		
MW-9			13:58				
MW-4			14:45				
MW-3			15:37				
MW-8			16:45				
MW-7			17:55				
Tripblank		5/29/01					
Relinquished by: (Signature/Affiliation)		Date	Time	Received by: (Signature/Affiliation)		Date	Time
<i>Ryan Eberle</i> Asset		5/31/01	11:35	<i>[Signature]</i>			
Relinquished by: (Signature/Affiliation)		Date	Time	Received by: (Signature/Affiliation)		Date	Time
<i>[Signature]</i>				<i>[Signature]</i>		6/1/01	
Relinquished by: (Signature/Affiliation)		Date	Time	Received by: (Signature/Affiliation)		Date	Time
<i>[Signature]</i>		6/1/01		<i>[Signature]</i>		6/1/01	1135
Report To: Mike Berrington		Bill to: ULTRAMAR INC.					
Delta Environmental		525 West Third Street					
		Hanford, CA 93230					
		Attention:					

WHITE: Return to Client with Report

YELLOW: Laboratory Copy

PINK: Originator Copy

Ultramar

Ultramar, Inc.
525 W. Third Street
Hanford, CA 93230-5016
(559) 582-0241

Fax: 559-583-3282 Environmental
559-583-3256 Retail Administration
559-583-3330 Human Resource
559-583-3382 Maintenance

February 14, 2001

Ms. Michelle Morris
Navajo EPA
Division of Natural Resource Office
P.O. Box 339
Windowrock, AZ 85615

**SUBJECT: FORMER BEACON TRUCKSTOP 12652, LUPTON, ARIZONA, WST-8,
SITE # NAV-001**

Dear Ms. Morris:

Enclosed you will find a copy of the ***Semi-Annual Ground Water Monitoring Report*** for the above-referenced former Ultramar Inc. facility, prepared by Delta Environmental Consultants, Inc. The report summarizes field monitoring activities performed on December 19, 2000.

If you have any questions regarding the report, please call me at (559) 583-3345.

Sincerely,

ULTRAMAR INC.



Robert D. Fishburn
Senior Project Manager
Marketing Environmental Department

Enclosures

cc: Mr. Walter Guggenheimer, Mail Code H-2-1, United States Environmental
Protection Agency, Region IX, 75 Hawthorne Street, San Francisco, CA 94105-
3901

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A Member of the Ultramar Group of Companies

BEACON
#1 Quality And Service

Ultramar

Ultramar, Inc.
525 W. Third Street
Hanford, CA 93230-5016
(559) 582-0241

Fax: 559-583-3282 Environmental
559-583-3256 Retail Administration
559-583-3330 Human Resource
559-583-3382 Maintenance

November 30, 2000

Ms. Michelle Morris
Navajo EPA
Division of Natural Resource Office
P.O. Box 339
Windowrock, AZ 85615

**SUBJECT: FORMER BEACON TRUCKSTOP 12652, LUPTON, ARIZONA, WST-8,
SITE # NAV-001**


Dear Ms. Morris:

Enclosed you will find a copy of the ***Semi-Annual Ground Water Monitoring Report*** for the above-referenced former Ultramar Inc. facility.

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A Member of the Ultramar Group of Companies

BEACON
#1 Quality And Service



Chris Prokop/R9/USEPA/US
04/30/2009 04:14 PM

To "Wideman, Shay" <Shay.Wideman@valero.com>

cc Carl Warren/R9/USEPA/US@EPA

bcc

Subject Carl Warren's potential availability for a meeting in Window Rock to discuss the former Beacon Truck Stop #652 UST cleanup site in Lupton, AZ (EPA ID# NAV-001), and other matters

Shay- Thank you for your email below regarding your ongoing review of documents pertaining to the former Beacon Truck Stop #652 UST cleanup site, as well as your forthcoming letter on this matter. Carl Warren wanted me to inform you that he won't be available for a meeting next month in Window Rock to discuss this LUST site, but he intends to contact you shortly about a potential meeting in June.

With regard to your question about a possible EPA Consent Order with the current UST operator (Speedy's), I can only say that I'm not at liberty to comment on that matter based on discussions with my colleagues. Carl and I look forward to reviewing your letter on the LUST site. Thank you, Chris, phone: 415-972-3363, fax: 415-947-3530.

"Wideman, Shay" ---04/27/2009 11:25:15 AM---Good afternoon Chris. I wanted to let you know that I am co

From: "Wideman, Shay" <Shay.Wideman@valero.com>
To: Chris Prokop/R9/USEPA/US@EPA
Date: 04/27/2009 11:25 AM
Subject: RE: Our conversation this morning regarding the former Beacon Truck Stop #652 UST cleanup site in Lupton, AZ

Good afternoon Chris. I wanted to let you know that I am completing my review of the file and will have a response by the end of the week. I will be out of the office for the next two day's (medical leave – Son having surgery) I will be back in on Thursday, and will be meeting with our legal group to discuss their review of the Purchase Agreement from Telum, and the sales Agreement to the current operator.

Have you found the Consent Order that is in effect for the current operator? I would like to see that as soon as you can. Thanks!

Shay Wideman

Director – Environmental Liability Management

Shay

From: Prokop.Chris@EPA.GOV [mailto:Prokop.Chris@EPA.GOV]

Sent: Tuesday, April 07, 2009 2:44 PM

To: Wideman, Shay

Cc: henryhaven@navajo.org; Linder.Steven@epamail.epa.gov; Warren.Carl@epamail.epa.gov

Subject: Our conversation this morning regarding the former Beacon Truck Stop #652 UST cleanup site in Lupton, AZ

210 - 345
4663

Shay- Thanks for taking the time to speak with me this morning about the previous UST cleanup activities at the former Beacon Truck Stop #652 in Lupton, AZ (EPA ID# NAV-001). During our discussion, you indicated you would probably be Valero's Project Manager for this LUST site for the foreseeable future. You also indicated that Valero would probably send a letter to the U.S. EPA and the Navajo Nation EPA within about 3 weeks summarizing the current status, and potentially recommending a conference call and/or meeting in Window Rock to discuss the next steps (any in-person meeting might need to include Speedy's participation). Please send Valero's letter simultaneously to the two individuals listed below. It would probably be advisable to send Valero's letter via email in "pdf" to accelerate the review process (please refer to the "cc" list above).

- 1) Mr. Steven C. Linder, P.E., Manager
Underground Storage Tanks Program Office
U.S. EPA (WST-8)
75 Hawthorne Street
San Francisco, CA 94105
- 2) Ms. Diane Malone
Environmental Department Manager
Waste Regulatory Compliance Department
Navajo Nation EPA
P.O. Box 3089
Window Rock, AZ 86515

Please "cc" Henry Haven of the Navajo Nation EPA at the same address listed above (Henry is the head of NNEPA's LUST team). In addition, please "cc" me and Carl Warren of U.S. EPA at the same address and mail code listed above.

I've included my notes from this morning's phone discussion below. Please let me know if I've accurately characterized our discussion. Thank you, Chris Prokop, U.S. EPA, phone: 415-972-3363, fax: 415-947-3530.

My notes from our 4/7/09 phone discussion on the former Beacon Truck Stop #652 LUST site

- Since July 2007, Valero has gone through at least one reorganization, which resulted in a shift in the Project Manager duties for the former Beacon Truck Stop #652 LUST site (the LUST site).
- You are currently the Project Manager for most, or all, of Valero's cleanup sites that don't have active fueling facilities ("non-operating" sites), and this includes the LUST site.
- An SVE pilot study was conducted at the LUST site following Burgess & Niple's 7/19/06 letter report recommending this. This pilot study was not favorable on the use of SVE at the LUST site.
- GES (Phoenix consulting firm) recently completed an extensive file review of the LUST site, the active Speedy's fueling facility on the same (?) property, and related issues. You are currently reviewing GES' report.

- Valero will be conducting a "fresh review" of the LUST site and all related issues.

Carl Warren/R9/USEPA/US
04/08/2009 08:57 AM

To "Wideman, Shay" <Shay.Wideman@valero.com>
cc
bcc
Subject RE: Our conversation this morning regarding the former
Beacon Truck Stop #652 UST cleanup site in Lupton, AZ

Shay -

Send me you phone number!

Thanks,

Carl

"Wideman, Shay" <Shay.Wideman@valero.com>



"Wideman, Shay"
<Shay.Wideman@valero.com>
>
04/08/2009 08:57 AM

To Chris Prokop/R9/USEPA/US@EPA, "George, Tim"
<Tim.George@valero.com>
cc "henryhaven@navajo.org" <henryhaven@navajo.org>,
Steven Linder/R9/USEPA/US@EPA, Carl
Warren/R9/USEPA/US@EPA
Subject RE: Our conversation this morning regarding the former
Beacon Truck Stop #652 UST cleanup site in Lupton, AZ

I spoke with Carl this morning, and we are working on a May meeting.

From: Prokop.Chris@EPA.GOV [mailto:Prokop.Chris@EPA.GOV]
Sent: Tuesday, April 07, 2009 2:44 PM
To: Wideman, Shay
Cc: henryhaven@navajo.org; Linder.Steven@epamail.epa.gov; Warren.Carl@epamail.epa.gov
Subject: Our conversation this morning regarding the former Beacon Truck Stop #652 UST cleanup site in Lupton, AZ

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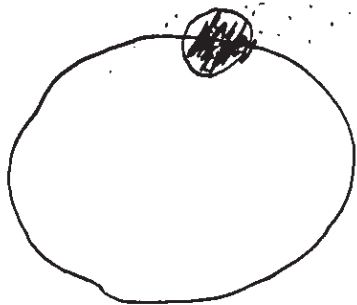
- 1) Mr. Steven C. Linder, P.E., Manager
Underground Storage Tanks Program Office
U.S. EPA (WST-8)
75 Hawthorne Street
San Francisco, CA 94105
- 2) Ms. Diane Malone
Environmental Department Manager
Waste Regulatory Compliance Department
Navajo Nation EPA
P.O. Box 3089
Window Rock, AZ 86515

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- Valero will be conducting a "fresh review" of the LUST site and all related issues.



6/19/09

~~Timeline~~

Timeline
on this site
who is responsible
and what actions

Former Beacon Truck Stop #652 (NAV-001), I-40 and Grant Road, Lupton, AZ

* Land ~~claim~~
determinations
Issues.

- The 12/5/89 UST notification form listed 7 USTs [5 were 20 years old (installed about 1970), and the other 2 were of "unknown" age). Ultramar, Inc. was listed as the owner of the USTs. Valero bought some portion, or all of Ultramar sometime before EPA's 12/8/06 letter to NNEPA, which described Ultramar as the "former owner".
- In April 1986, site assessment work began with the installation of 2 wells (MW-1/2). Two additional wells (MW-3/4) were installed in December 1986, and two more (MW-5/6) in October 1991. Wells MW-7, 8 & 9 had been installed as of Burgess & Niple's (Ultramar's consultant) 4/29/04 report to EPA. Figure 1 of this Report showed the following wells as being abandoned: MW-1, 2 (replaced by 2A), 5, 6, 7 & 9.
- Monitored natural attenuation (MNA) reportedly occurred during 1992-1996.
- In 1996/7, 8 USTs were removed from 2 locations on the southern portion of the property. At about this same time, or shortly thereafter, 3 new USTs were installed about 30 feet north of one of the former UST locations (these active USTs are currently operated by Speedy's Truck Stop).
- During 1997-1999, SVE was reportedly conducted around MW-1.
- MNA was again utilized during 1999-2004.
- EPA's 12/30/03 letter in Ultramar required enhanced bioremediation with oxygen and nutrients at MW-2A, but there is no file documentation indicating this was ever implemented.
- In April 2005, Burgess and Niple installed five new "monitor/treatment" wells (MW-10 to MW-14) within the former UST pit. MW-10, 11 & 14 had unexpectedly high benzene concentrations ranging from 12,000 to 34,000 ug/l. Burgess & Niple's 8/22/05 Report concluded that releases from the nearby, active UST system operated by Speedy's had caused these benzene concentration spikes. This conclusion was based, in part, on a 10+ year record of monitoring MW-2 (in the former UST pit), during which the benzene concentrations had dropped from 5,000 to 420 ug/l. The Report also alleged that there had been construction mistakes during the installation of Speedy's USTs in 1996/7. The Report stated that a remedial plan would NOT be developed until the source of the increased hydrocarbon contamination was verified. EPA's 12/8/06 letter supported the possibility of a Speedy's source for the increased hydrocarbon contamination at MW-2A.
- In December 2005, Burgess & Niple conducted a "forensic analysis" (fuel fingerprint study) to compare free product in monitoring wells to the fuel in Speedy's active dispensers. The fingerprint study (Report dated 4/20/06) was inconclusive, but free product was found in MW-10 (0.16 feet), MW-11 (1.38 feet), and MW-12 (0.90 feet).
- On 6/22/06, Burgess and Niple initiated free product removal activities. Free product was found at MW-10 (0.21 feet), MW-11 (1.42 feet), and MW-12 (1.52 feet). The following amounts of free product were removed from these same wells, respectively: 0.13 gallon, 0.9 gallon, and 1.0 gallon. The 7/19/06 letter report to Henry Haven (copying Walt Guggenheimer) stated that an SVE pilot test would be conducted soon.
- On 4/2/09, I contacted Thomas Sexton of Valero (current owner) by phone and email, and he agreed to give me a corrective action update by mid-April. On 4/3/09, Chip Simpson of Burgess & Niple's Phoenix office (602-244-8100) informed me that Burgess & Niple had done no additional work at this site after its 7/19/06 letter report.
- EPA's 12/30/03 letter to Ultramar also required an investigation of the source of the above-MCL benzene concentrations in the vicinity of MW-08 (6.0 ug/l in 2003) and at the "one-time" groundwater sampling location WS-03 (22 ug/l in 2003) in the northern portion of the property. MW-8 is about 400 feet northeast of the 8 former USTs that were removed by Ultramar in 1996/7. Burgess & Niple's reply to the EPA letter was that this northern contamination was probably not associated with its client's (Ultramar's) southern contamination, but more likely linked to Speedy's active USTs.
- Arthur Boone's 3/25/04 memo-to-file noted that the original property owner was John Knight, who then sold it to Ultramar/Beacon (now owned, in part or whole, by Valero). I believe the Nicholson family owns the active Speedy's station at this site.

Ultramar Inc.

June 15, 2009

Mr. Chris Prokop
Underground Storage Tanks Program Office
U.S. EPA (WST-8)
75 Hawthorne Street
San Francisco, CA 94105

Re: Truck Stop Facility
Grants Road & I-40
Lupton, Arizona
#NAV-001

Mr. Prokop:

Ultramar Inc. (Ultramar) has conducted a thorough review of the available files for the above referenced facility in preparation for a scheduled meeting with the Environmental Protection Agency (EPA) and the Navajo Nation EPA (NNEPA) on June 18, 2009 in Window Rock, AZ. The files reviewed include Ultramar's historical files as well as NNEPA files that were reviewed by Groundwater & Environmental Services, Inc. earlier this year. The NNEPA did not provide any files related to Speedy's operations at the time of the review. Therefore, we are confident that the files we received are incomplete as there is no documentation of any work conducted by Speedy's Inc, the current owner. As noted in several press releases, Speedy's has been a significant contributor to contamination on the site, and there is no evidence of any corrective action.

From our review, Ultramar is making the following assertions to assist the EPA and NNEPA in their efforts to remediate this site.

Ultramar is not the Responsible Party for Release ID # NAV001.

Release ID #NAV001 was issued to Telum, Inc. as a result of a release reported on 4/30/1986. The release was reported due to the discovery of contaminated soil and groundwater discovered during a real estate divestment assessment. The borings/monitoring wells were not located in the source area of the existing underground storage tanks, and appeared to be chosen randomly to determine if any contamination existed onsite prior to Telum's sale of the property. Contamination discovered in these locations indicates a more extensive problem in the source area that was never addressed by Telum. Additionally, the aboveground diesel tank was not properly assessed to determine any contribution caused by releases that may have occurred from this potential source.

On 2/10/89, NNEPA issued a No Further Action Letter to Telum, Inc. This was overturned by the EPA on 3/14/1990. Apparently there was some controversy over the closure as a result of a NNEPA employee being hired by Telum, Inc.

Telum, Inc. is the Primary Responsible Party for Release ID #NAV001, and has failed to meet their RCRA obligations at this facility.

As a result of the EPA overturning the NNEPA closure, Telum began to assess the site. However, the source area was still ignored. After the sale of the facility to Ultramar on or about May 30, 1986, Telum continued to ignore their regulatory responsibilities to remediate their release. Ultimately, Ultramar had to step in to maintain compliance. In retrospect, EPA should have demanded that Telum meet their regulatory responsibilities.

Ultramar reported one suspected release during its operations.

Ultramar operated the site from approximately May 30, 1986 until April 24, 1996. During that time, there was one suspected release from an unleaded product line that was repaired on August 16-17, 1995. The suspected line release at the site was reported as a result of inventory reconciliation, and confirmed with a line test in August 1995. Correspondence reviewed supports the fact that the calculated loss of product through the gasoline dispensers was inaccurate due to incorrect dispenser calibrations. Soil samples were taken, and there were detections of hydrocarbons in the soil. There is no evidence that groundwater was impacted as a result of this incident. Soil contamination noted in the report appears to have been excavated during the system removal that occurred in October 1996 when the UST system was completely removed. We believe that un-remediated soil previously existed in this area as a result of Telum's operations, as they never assessed the source area of the tanks and lines. No Release ID was issued to Ultramar as a result of this suspected release.

Speedy's is the current Owner/Operator, a significant contributor to soil and ground water contamination, and the primary Responsible Party

Ultramar sold the facility to Savoy Trucking Company on 4/24/1996. It is our understanding that the site was then transferred through sale or lease to Speedy's Convenience Inc. who has been the owner/operator ever since. Speedy's removed the UST system that was installed by Telum in December 1996. They installed a new UST system that they have operated ever since. Neither Telum, nor Ultramar have ever operated the existing UST system.

Speedy's has significant compliance problems.

Attached is a copy of a press release from the Gallup Independent dated March 9, 2004, wherein the ADEQ stated that the Speedy's facility was "literally a dumping ground for waste" and stated the Owners were being cited for violations including:

- Failure to perform hazardous waste determination. According to ADEQ, the facility representative did not express knowledge of, and no paperwork was available for review as to the contents of the liquid and sludge in the waste tank, the eight 55-gallon containers labeled as "Waste Pending Analysis" located at the northwest corner of the facility, the three 55-gallon containers labeled as "Non-Hazardous Waste," or the 55-gallon container labeled as "Waste Material" near the well house.
- Treatment, storage, or disposal of hazardous waste without a permit. Compliance officers observed an internal piping station where the joint in one of the pipes was leaking MTBE and ethanol at approximately 2 gallons per minute. The facility representative stated that toluene is stored in Tank #10 at the facility. In the past, toluene has been pumped through the pipe with the leaking joint. All liquids from the internal piping station drain into a waste tank.
- Failure of a used oil generator to perform the required cleanup steps upon detection of a release of used oil to the environment. The Feb. 24 inspection revealed that used oil was being stored in two 55-gallon drums on the west side of the tire store/maintenance shed. At the time of the inspection, the used oil barrels were overflowing and rain water and oil mixture was flowing from the concrete floor onto the bare ground.
- Failure to make a waste determination for excavated soil contaminated with petroleum. The Feb. 24 inspection revealed that a large pile of excavated soil contaminated with petroleum is being stored on the property. Facility personnel were unable to provide waste determination records for the soil pile. ADEQ also was told that the soil had been excavated and was being put aside, however, personnel could not answer any questions related to waste determination and/or proper management of the excavated soil.

- Creation of a risk to public health or the environment by failing to cover or otherwise manage storage piles in a manner that controls wind dispersal of petroleum-contaminated soils. The inspection revealed that excavated soil contaminated with petroleum was being stored uncovered on bare ground. A visual observation of the stockpiled soil revealed that it is not being protected from wind or rain and appears to be drenched from ongoing rain and snow.
- Failure of the owner or operator of a solid waste land disposal facility to obtain approval of a solid waste facility plan. The Feb. 24 inspection revealed that waste sludge from the facility's waste collection tank has been disposed on adjacent property owned by the Yellowhorse family. Facility personnel were unable to produce waste management protocols and/or documentation demonstrating that the sludge from periodic cleanup of the waste tank and/or still bottoms is being characterized and disposed properly.
- Failure to properly label containers or above-ground tanks or fill pipes used to store used oil at a generator facility. The inspection also revealed that used oil is being stored in two 55-gallon unlabeled barrels on the west side of the tire shop/maintenance shed.

There is no evidence of any Release ID's being assigned to Speedy's as the result of their significant contamination

The file review does not have any information as to how Speedy's responded to the complaints brought against them.

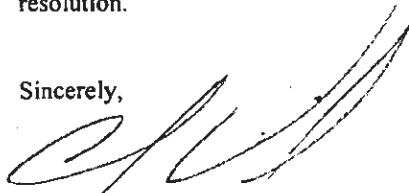
Ultramar has done significant amounts of work to assist the EPA without being a Responsible Party as defined by any Regulatory Agency, either Federal or State.

Based on our file review, Ultramar has made significant efforts to assess and conduct corrective action work over the years. Much of the work has been conducted as a direct result of Telum, Inc.'s failure to perform its corrective action responsibilities. However, Speedy's operations are of far greater concern and should be evaluated by the appropriate regulatory agency.

Ultramar is willing to meet with EPA and NNEPA to conduct a site visit. However, we respectfully decline to be responsible for releases caused by former owner/operators, or current owners with significant environmental impacts. Should the EPA or NNEPA compel these parties to be present at the meeting, we request that information prior to meeting.

I look forward to our meeting in Window Rock and onsite on June 18, 2009, and hope to bring this matter to a quick resolution.

Sincerely,



C. Shay Wideman
Director - Environmental Liability Management

cc:

Steven C. Linder - Underground Storage Tanks Program Office - U.S. EPA
Carl Warren - Underground Storage Tanks Program Office - U.S. EPA
Diane Malone - Environmental Department Manager - NNEPA
Henry Haven - Environmental Department Manager - NNEPA

facsimile
TRANSMITTAL



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Underground Storage Tank Program Office
75 Hawthorne Street (WST-8)
San Francisco, CA

Name: Thomas Sexton
Organization: Ultramar (Chevron)
Fax: 559-583-3282
Phone: 559-583-3231
From: Walter R Guggenheimer
Date: 02/04/08
Subject: Last report on Ultramar site, Lupton, AZ
Pages: eleven

Dear Mr. Sexton

As discussed in our telephone conversation today, March 4, 2008 I enclose the front part of the last report received by EPA on the former Beacon Truck Stop. The report was prepared by Burgess & Niple of Phoenix, AZ. I further include the front page of Ultramar's last report addressed to EPA prepared by Robert D. Fishburn of Ultramar, Inc. I assume that Mr. Fishburn was your predecessor.

Regards


W. R. Guggenheimer

From the Court of...

Brian Miller

13

F 11 14et 5

NAV-001

Ultramar

Ultramar, Inc.
685 W. Third Street
Hanford, CA 93230-5016
(559) 582-0241

Fax: 559-583-3282 Environmental
559-583-3256 Retail Administration
559-583-3330 Human Resource
559-583-3382 Maintenance

February 25, 2003

Mr. Walter Guggenheimer
Mail Code H-2-1
United States Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

**SUBJECT: FORMER BEACON TRUCKSTOP 12652, LUPTON, ARIZONA, WST-8,
SITE # NAV-001**

Dear Mr. Guggenheimer:

Enclosed you will find a copy of the ***Semiannual Report Summarizing Groundwater Sampling Activities***, for the above-referenced former Ultramar Inc. facility, prepared by Allen Stephenson & Associates. The report summarizes field-monitoring activities performed on January 3, 2003.

If you have any questions regarding the report, please contact me at (559) 583-3345.

Sincerely,

ULTRAMAR INC.



Robert D. Fishburn
Senior Project Manager
Marketing Environmental Department

Enclosures

CC:

w/encl. Mr. Henry Haven, Navajo EPA, Division of Natural Resource Office, P.O.
Box 339, Windowrock, AZ 85615

w/o encl. Dino Gotsis, Allen Stephenson Associates, Phoenix, AZ

N:\MSOFFICE\Environmental Files\Southern Zone\12652\02/25/03



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NAV-001

BURGESS & NIPLE

Mr. Henry Haven, Geologist
Navajo Nation Environmental
Protection Agency
P.O. Box 339
Window Rock, Arizona 86515

Re: Groundwater Sampling Activities in the
Vicinity of the Former UST pit
Former Beacon Truck Stop #652
Lupton, Arizona
Facility I.D. #NAV-001L

April 20, 2006

Dear Mr. Haven:

Burgess & Niple (B&N) is pleased to provide the following summary of groundwater sampling activities performed at the former Beacon Truck Stop #652 in Lupton, Arizona (Attachment I, Figure 1). The groundwater sampling activities were completed with reference to the tasks described in a letter sent to you dated December 2, 2005.

INTRODUCTION

B&N's groundwater sampling activities were completed on December 19th and 20th, 2005. The objective was to evaluate groundwater flow conditions and assess petroleum hydrocarbon impacts to the groundwater in the vicinity of the former UST pit adjacent to the restaurant (Attachment I, Figure 1).

BACKGROUND

Ultramar, Inc. (Ultramar) has retained B&N to provide environmental consulting support associated with the referenced leaking underground storage tank (LUST) case file. The Environmental Protection Agency (EPA) and Navajo Nation EPA serve as the regulatory authority pertaining to the LUST release. Ultramar has been monitoring the release since 1986. The former UST system operated by Ultramar was removed in 1996. The current UST system (installed in a separate location) has been owned and operated by Speedy's Truck Stop (Speedy's) since 1996.

In a report prepared by B&N, dated August 22, 2005 and submitted to Mr. Walt Guggenheimer with Region IX of the EPA, a summary of activities was given regarding the installation and sampling of five monitor/treatment wells in the vicinity of the former UST pit at the referenced site. In summary, the analytical laboratory results obtained from the installation and sampling of the monitor/treatment wells indicated the presence of elevated petroleum hydrocarbon concentrations. The elevated concentrations were unexpected, and suggested that the concentrations detected in the wells could be attributed to a second release that is not associated with the release that Ultramar has been monitoring for the last 20 years. It was also noted that these wells are located within 30 feet of Speedy's current active gasoline fuel dispensers. In an effort to determine whether the unexpected elevated petroleum hydrocarbon concentrations were attributed to the original

Burgess & Niple, Inc.

5025 East Washington Street
Suite 212
Phoenix, AZ 85034
602 244.8100
Fax 602 244.1915

April 20, 2006

Page 2

release, or to some other source, Ultramar elected to return to the site to evaluate groundwater flow conditions, and to perform additional sampling of the monitor/treatment wells located within the former UST pit, and more importantly, collect samples (groundwater and product) from the newly installed treatment wells for forensic analysis. Samples of regular, plus and premium-grade gasoline were also to be collected from Speedy's adjacent gasoline dispensers, and submitted for forensic analysis. The test results from the samples collected from the monitor wells would be compared to the test results from the samples collected from the fuel dispensers. A summary of B&N's field activities and findings are described herein.

METHODS

On December 19th, 2005 groundwater level measurements and product measurements were collected from monitor wells MW-02A, MW-03, MW-04, MW-08, MW-10, MW-11, MW-12, MW-13, and MW-14, in order to calculate the regional groundwater flow direction across the site, and to calculate the localized flow direction in the immediate vicinity of the former UST pit. On December 20th, 2005, groundwater samples were obtained from the monitor/treatment wells in the vicinity of the former UST pit, and from monitor well MW-4. Monitor well MW-4 is located northeast of the former UST pit (up- and cross-gradient of the former UST pit), and had not been sampled since July 7, 2003. Assessing MW-4 served to determine whether elevated petroleum hydrocarbons were also present in this monitor well, which is located closest to and down-gradient of the fuel processing plant and adjacent to Speedy's diesel fuel dispensers. Monitor wells MW-3 and MW-8 were not be sampled during this event. All of the groundwater sampling activities were performed by Steven Sutherland of B&N, an Arizona-registered geologist.

Prior to beginning any sampling activities, the static groundwater level measurements were collected from each of the existing monitor wells at the facility. The groundwater levels and their respective elevations are presented on Figure 1 (Attachment I).

Once the static groundwater levels were established, each of the wells were checked for the presence of a hydrocarbon sheen and/or free phase product. This task was accomplished with a clear disposable bailer for visual inspection, and then measured with an oil/water interface probe in cases where measurable product was identified via the visual inspection. If measurable product was identified in any of the wells, one sample of the product was collected for forensic analysis, and the remaining bailed product was placed into a 55-gallon drum for disposal. For those wells that did not exhibit measurable product, a minimum of three well casing volumes of water were purged from each well using a decontaminated 2-inch diameter Grundfos submersible pump. Purge rates ranged from one to two gallons per minute (gpm). The Grundfos pump was decontaminated between wells by pumping approximately 20 gallons of water mixed with a laboratory grade detergent through the pump, followed with a rinse of approximately 20 gallons of de-ionized water through the pump. The exterior of the pump and tubing was also scrubbed as necessary and rinsed in a similar fashion. Monitor well MW-02A was purged via hand-bailing using a new disposable bailer, due to the historically slow recovery of the well.

During the purging of each well, water quality field measurements were obtained and recorded. Water quality parameters, including pH, temperature, specific conductance and redox (oxidation/reduction potential) were obtained after approximately each well casing volume was purged. Also, qualitative descriptions were noted regarding the clarity and color of the water being purged, as well as any odors that were encountered. The readings were monitored to verify that these parameters had stabilized prior to sample collection.

Following completion of the well purging activities at each well, groundwater samples were collected using new disposable bailers and placed into laboratory-prepared sample containers. Each sample container was labeled with the sample number, the initials of the person collecting the sample, the date and time of sample collection, and the desired analyses, and was then placed into a cooler with ice, and then transported to Transwest Geochem, an Arizona-certified analytical laboratory (Arizona Department of Health Services License #AZ0133). The samples were transferred to the laboratory via thermally insulated cooler filled with ice. All samples remained under chain-of-custody documentation between the time of sampling and delivery to the laboratory. The monitor well samples were analyzed for benzene, toluene, ethylbenzene and total xylenes (BTEX) and MTBE (methyl-tertiary butyl ether) via EPA Method 8260B, and for full-range total petroleum hydrocarbons (TPH) via Arizona Department of Health Services (ADHS) Method 8015AZ.R01. The TPH analysis includes gas range petroleum hydrocarbons (GRO) in the C_6 to C_{10} range, diesel range hydrocarbons (DRO) in the C_{10} to C_{22} range, and oil range hydrocarbons (ORO) in the C_{22} to C_{32} range. The addition of reportable GRO, DRO, and ORO hydrocarbons represents the total petroleum hydrocarbon result for that sample (TPH).

In addition to the groundwater sampling activities, the three grades of gasoline dispensed at the site were sampled from an adjacent Speedy's dispenser. These fuel samples, a sample of product collected from monitor well MW-11, and a groundwater sample collected from monitor well MW-14 were submitted to Friedman & Bruya, a laboratory in Seattle, Washington that specializes in forensic analysis of fuel samples. The samples were transferred to the laboratory via thermally insulated cooler filled with ice. All samples remained under chain-of-custody documentation between the time of sampling and delivery to the laboratory. Each of the samples were analyzed for a hydrocarbon fuel scan via modified version of EPA Method 8015, and for a PIANO analysis (referring to paraffin, isoparaffin, aromatic, naphthalene, and olefin constituents). In addition, the product sample collected from monitor well MW-11 was also analyzed for organic lead speciation and manganese by a modified version of EPA Method 8082, and for total organic lead and manganese by a modified version of EPA Method 200.8.

GROUNDWATER FLOW CONDITIONS AND GROUNDWATER ANALYTICAL LABORATORY RESULTS

The regional groundwater flow direction at the site was calculated to be to the southeast (derived from groundwater elevation information collected from monitor wells MW-03, MW-08 and MW-14), at South 20 degrees East, with a gradient of 0.006. The localized flow direction in the immediate vicinity of the former UST pit was calculated to be to the northeast (derived from groundwater elevation information collected from monitor wells

April 20, 2006

Page 4

MW-11, MW-13 and MW-14), at North 50 degrees East, with a gradient of 0.0915. Note that the elevation used from monitor well MW-11 was corrected for the presence of free phase product prior to the calculation of the flow direction (Figure 1).

Initial inspection of the monitor wells indicated the presence of free-phase product in monitor wells MW-10, MW-11 and MW-12, at thicknesses of 0.16 feet, 1.38 feet and 0.90 feet, respectively. Due to the presence of the product in these wells, groundwater samples were not collected. The laboratory analysis of the groundwater samples collected from monitor wells MW-02A, MW-04, MW-13 and MW-14 indicated detectable BTEX constituent concentrations in each of the samples. None of the samples exhibited any MTBE concentrations in excess of the laboratory reporting limit. MW-02A, MW-13 and MW-14 exhibited benzene concentrations in excess of its MCL, at 10 micrograms per liter ($\mu\text{g/l}$), 2,900 $\mu\text{g/l}$, and 31,000 $\mu\text{g/l}$, respectively. In addition, MW-14 exhibited toluene and ethylbenzene in excess of their respective MCLs, at 21,000 $\mu\text{g/l}$ and 2,000 $\mu\text{g/l}$. None of the other reportable BTEX concentrations exceeded any regulatory levels (Figure 2).

Reportable GRO and DRO concentrations were also present in the groundwater samples collected from MW-13 and MW-14, with TPH concentrations at 9.2 and 79.1 milligrams per liter (mg/l), respectively. Currently, there are no EPA regulatory levels for TPH.

A summary of the analytical results for all of the groundwater monitor well samples is presented in Table 1 (Attachment II). The Transwest Geochem analytical laboratory report and chain-of-custody documentation are presented in Attachment III. The analytical report identifies the analytical method, sample media and collection date, extraction date, analyses date, and reporting limit of the laboratory analyses.

PRODUCT ANALYTICAL LABORATORY RESULTS

The samples collected from monitor wells MW-11 and MW-14 and from the fuel dispensers were analyzed via modified version of EPA Method 8015 (hydrocarbon fuel scan) and for the PIANO constituents (as previously described). A correlation of the test results of the dispenser samples and the samples collected from the monitor wells was inconclusive. The data showed that some degradation has occurred to the samples collected from the wells, and a probable release date could only be accurately reported as being 'two or more years ago'. In addition, the report indicated that the fuel dispenser samples showed lower levels of isooctane and isoparaffins than what was indicated in the product sample from MW-11. If the product in MW-11 had originated from the fuel dispenser area and the dispensed fuel formulations remained unchanged at the site, then the product would be expected to have lower levels of isooctane and isoparaffins than the original product.

In an effort to further characterize the product identified in the monitor wells, the product collected from monitor well MW-11 was analyzed for lead content (as previously described). The results of the organic lead speciation indicated the presence of tetraethyl lead (TEL) at 55 micrograms per gram ($\mu\text{g/g}$), trimethylethyl lead (TMEL) at 2 $\mu\text{g/g}$, and methyltriethyl lead (MTEL) at 1 $\mu\text{g/g}$. In addition, the total organic lead analysis also indicated the presence of organic lead at 45.3 $\mu\text{g/g}$. The TEL, TMEL and MTEL are not

naturally occurring compounds. TEL is one of the more prevalent lead additives in gasoline since first being introduced as an antiknock compound in the 1920's. Due to the promulgation of the Clean Air Act regulations by the EPA, the use of lead additives in gasoline was discontinued as of December 31, 1987.

The Friedman & Bruya analytical laboratory report and chain-of-custody documentation are presented in Attachment IV. The analytical report identifies the analytical method, sample media and collection date, extraction date, analyses date, and reporting limit of the laboratory analyses.

INVESTIGATIVE DERIVED WASTE

The groundwater sampling activities and removal of the free-phase product from monitor wells MW-10, MW-11 and MW-12 was contained in two 55-gallon drums. Upon completion of the activities at the site, the drums were secured, and then appropriately labeled. Subsequently, arrangements were made Philip Transportation and Remediation (ROC#100177), a division of Philip Services Corporation (PSC), for the transportation and disposal of the investigative derived waste. The drums were appropriately manifested, and then removed from the site by PTR in January 2006 for disposal.

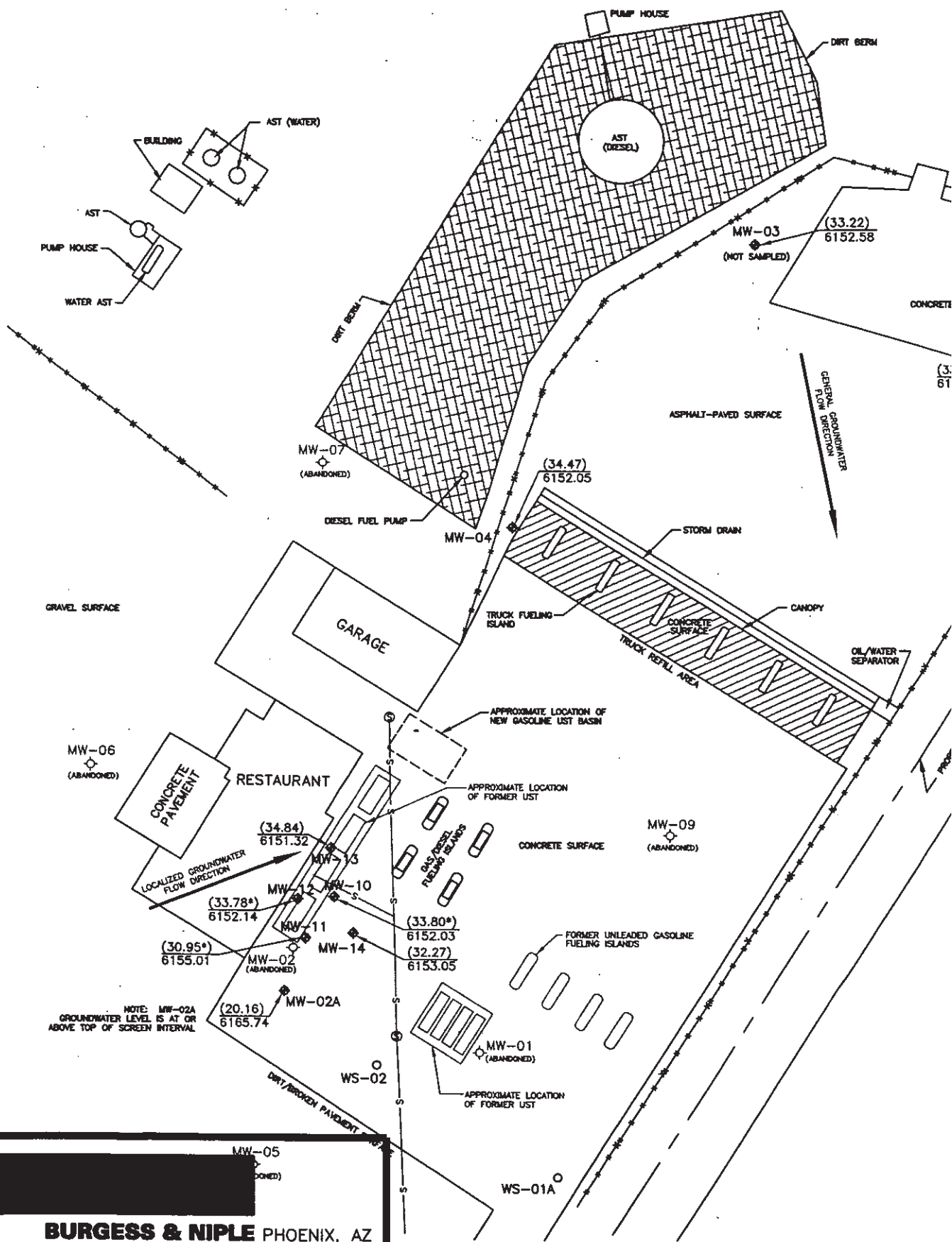
CONCLUSIONS AND RECOMMENDATIONS

The calculated groundwater flow from this round of sampling activities indicates variable flow directions at the site. The flow directions indicate a similar consistency to historically reported conditions at the site, where the flow directions appear to converge within the central portion of the site. Although variable at the site, regional groundwater flow conditions likely flow southerly, in the general trend of the valley axis.

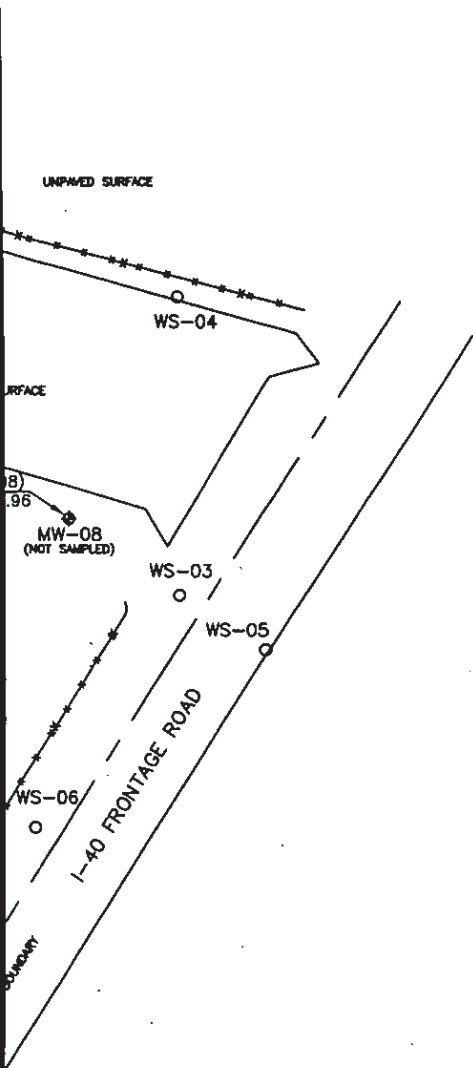
Dissolved phase hydrocarbons detected in monitor wells MW-02A, MW-13 and MW-14 exceeded one or more of the MCLs established for BTEX compounds. Dissolved phase hydrocarbons detected in monitor well MW-14 were reported at concentrations that suggest that free phase product may also be present. Monitor well MW-14 is located approximately 20 feet southeast of the former gasoline UST pit area.

Since product was not identified in monitor wells MW-02A, MW-10 and MW-14, the lateral extent of the product appears to be localized within the western portion of the former UST pit, with the greatest measurable amount in the vicinity of monitor well MW-11.

While the correlation of the hydrocarbon fuel scan and PIANO analysis of the samples collected from the fuel dispensers and from the monitor wells was inconclusive, the presence of lower concentrations of isooctane and isoparaffins in the product sample collected from MW-11 indicates that the free phase product is not consistent with the three fuel grades being dispensed on December 20, 2005.



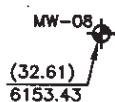
BURGESS & NIPLE PHOENIX, AZ



SCALE: 1" = 70'

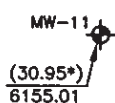


LEGEND



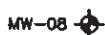
DEPTH TO GROUNDWATER (FEET BELOW TOP OF CASING) AND GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL

(32.61)
6153.43



CORRECTED DEPTH TO GROUNDWATER AND GROUNDWATER ELEVATION (FLOATING PRODUCT OBSERVED IN MONITOR WELL—SEE FIG. 2 FOR DETAIL)

(30.95*)
6155.01



GROUNDWATER MONITORING WELL LOCATION AND IDENTIFICATION



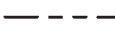
ABANDONED GROUNDWATER MONITORING WELL LOCATION



HYDOPUNCH GROUNDWATER SAMPLING LOCATION (DRILLED & SAMPLED JULY 2003)

UST UNDERGROUND STORAGE TANK

AST ABOVE GROUND STORAGE TANK



PROPERTY BOUNDARY



FENCE



AREA ENCLOSED BY DIRT CONTAINMENT BERM

NOTE: THIS DRAWING ADAPTED FROM DELTA DRAWING NAME: FIGURE 1, DATED: FEB. 11, 1997

GROUNDWATER ELEVATIONS
DECEMBER 19th-20th, 2005
BEACON TRUCK STOP #652 EXIT
359, GRANT ROAD AND I-40
LUPTON, ARIZONA

FIGURE

1

April 20, 2006

Page 6


Analysis of the free phase product for organic lead confirmed the presence of TEL, TMEL, and MTEL. The speciated lead compounds indicate that the product sample collected from MW-11 was originally a formulated leaded gasoline.

Although the field activities performed by B&N suggest that a portion of the free phase product may have originated from the original UST system, active monitoring should continue as other sources may be contributing to the hydrocarbon impacts detected at the site. Due to the presence of the free phase product, B&N recommends that a product recovery program be implemented at the site. In the interim of removing the product, B&N recommends evaluating remedial alternatives to optimize source removal within the former UST pit.

This letter report has been prepared in accordance with the industry's standard level of care. B&N does not warrant the information provided to us from third parties. The opinions expressed within this document are the professional opinion of B&N and are based upon our understanding of the project as of this date. Should you have any questions regarding any portion of this report, please contact Mr. Dino Gotsis, B&N's Project Manager at (602) 244-8100 or Mr. Robert D. Fishburn, Ultramar's Marketing Environmental Supervisor at (559) 583-3345.

Sincerely,


Steven Sutherland
Project Geologist




Dino Gotsis
Project Manager

copy: Robert Fishburn, Ultramar
Walt Guggenheimer, U.S. EPA

Attachments:

- Attachment I – Figures
- Attachment II – Table
- Attachment III – Transwest Geochem Laboratory Analytical Results
- Attachment IV – Friedman & Bruya Laboratory Analytical Results

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Ultramar Inc.

July 9, 2009

Mr. Carl Warren
Underground Storage Tanks Program Office
U.S. EPA (WST-8)
75 Hawthorne Street
San Francisco, CA 94105

Re: Truck Stop Facility
Grants Road & I-40
Lupton, Arizona (the "Site")
#NAV-001

Mr. Warren:

Thank you for meeting with me on June 18th. It was a very productive meeting, and I think we all have a better understanding of the current surface conditions at the Site. As we discussed, Ultramar Inc. ("Ultramar") committed to continue its review of the Site data and respond to you by July 10th on our findings as well as a workplan. Specifically, we discussed Ultramar delivering the following:

- Provide chronology of Site activities and ownership changes.
- Provide a summary table of soil and groundwater data gathered to date.
- Provide Site maps from prior reports to show development of changing Site conditions.
- Provide a workplan to define the course of action recommended.

Chronology

A Site chronology based on the information we have available is included in Attachment A. The chronology does not include information prior to 1986 when Ultramar entered into an agreement with Telum, Inc. ("Telum"). It is our understanding that this Site may have been used for gasoline/diesel distribution since the 1940's. Ultramar does not have access to information on the development of the Site since it sold the facility in 1996.

Soil and Groundwater Data

The attached soil table combines all of the soil data gathered from the Site since the first known assessment in 1986. The Site has been broken into several source areas to assist in the discussion of contribution of the various Responsible Parties.

- **Source Area A** – This is the area surrounding the four former underground storage tanks in front of the building that existed when Ultramar acquired the Site from Telum. There is no evidence that Ultramar ever operated these tanks. They held leaded fuel and appear to have been out of service when Ultramar acquired the Site. These tanks were removed when Ultramar sold the Site to Savoy Trading Company, Inc. ("Speedy's") in 1996.
- **Source Area B** – This is the area surrounding the former unleaded tank basin that was utilized by Telum, and eventually Ultramar. This area was in use up to the sale of the Site to Speedy's.

- **Source Area C** – This is the area near the above ground diesel tank at the west end of the dispenser fueling island, and the diesel fueling island.
- **Source Area D** – This is the area near the large aboveground diesel tank that to the best of Ultramar's knowledge was previously utilized by both Telum and Ultramar, and is currently utilized by Speedy's.
- **Source Area E** – This is the area from the east end of the diesel dispenser island and the trench along I-40.
- **Source Area F** – This is the area behind the warehouse as noted on Site plans from 1993.

Soil

Soil data has been gathered since 1986, and summarized in various reports:

Environmental Investigation – Dated 4/30/1986 – This report contains soil and groundwater data from a real estate divestment investigation conducted prior to the sale of the Site from Telum to Ultramar. Soil data was gathered from Source Areas A, B, C, and D. Source area A is of greatest concern with Csat concentrations extending down to 35' BGS. This is in the area of the current free product, and existed prior to Ultramar acquiring the property. At that time, EPA and Navajo Nation EPA issued directives to Telum, Inc.

Supplementary Contamination and Monitoring Well Installation – Dated 12/31/1986 – This report contains data from the installation of two borings/monitoring wells in area B, and D to a depth of 30' BGS. Only TRH was sampled. However, strong hydrocarbon odors were noted in the soil boring from Source Area B (unleaded tank basin).

Subsurface Evaluation – Dated – 6/19/1990 – This report contains data from four (4) test holes (TH) that were located south of any source area. The only rationale was for some type of distant delineation. Even so, product odor was noted in some borings. The samples were taken below the water table; were saturated, and are therefore invalid for soil delineation determination.

Phase II Site Assessment – Dated 7/21/1993 – This report is the most comprehensive assessment conducted at the Site. Soil data was gathered from areas B, C, and D. Data from Source Area B (unleaded tank basin) had significant concentrations of BTEX, and TPHg. Data from Source Area C was of concern in that boring SB-11-1-25 had TPH concentrations of 17,000,000 PPB TPH at a depth of 25' BGS. This boring was near aboveground diesel tanks installed by other parties at the north end of the diesel dispenser island. Data from Source Area D (north of each diesel dispenser) was not sampled for BTEX, and had high detection levels (20,000 PPB) on TPH. Diesel odor was noted in all borings. This report also contained Hand Auger borings in Source Area's C', E, and F. One sample had TRPH of 34,000,000 ppb at 5' BGS. Other Hand Auger samples had significant TRPH concentrations in the 300,000 - 400,000 ppb range. Thus supporting the widespread nature of the historical contamination.

Additional Phase II Assessment – Dated – 6/27/1995 – This report contains data from the installation of soil borings and monitoring wells in Source Area C, between Source Area B and C, and on the far NE corner of the Site in an area of no known source. Data from MW-7 had the highest concentration of TPHd at 250,000 ppb at a depth of 25' BGS. Detection levels were still high at 20,000 ppb as seen in prior reports. There was no significant contamination detected in the area between Source Area B and C. Nor, were there any detection's in MW-8 on the far NE corner of the Site.

Unleaded Product Line Assessment – Dated – 10/2/1995 - This report documents soil data gathered during the replacement of an unleaded product line segment. Significant BTEX and TPH concentrations were noted to a depth of 10' BGS. However, they were significantly less than those found in an earlier boring in the same area. Much of the soil from this event was excavated and disposed of offsite.

UST Removal Report – Dated – 12/5/1996 – This report documents the removal of the four underground storage tanks located in front of the existing building that were operated by Telum (Source Area A), and the four underground storage tanks that contained unleaded gasoline and were operated by Telum, and Ultramar (Source Area B). There was significant soil contamination noted in Source Area A. TPHg and TPHd ranged from 310,000 ppb to 11,000,000 ppb. Source Area B had significant concentrations of BTEX and TPHg at 11' to 16' BGS.

Soil Boring Report – Dated 9/26/1996 – This report contains soil data from the location where Speedy's currently has their UST installation. Data from this report sets a baseline to contamination that existed prior to their operations. BTEX was not sampled. TPHd was reported at 2,200,000 ppb at an unknown depth. Ultramar did not store, nor did Ultramar sell diesel at this location.

MW-10 through MW-14 Installation Report – Dated 8/22/2005 – This report contains data from the installation of two wells in Source Area A. Data indicates significant contamination down to 30' BGS. This is in the area that was not operated by Ultramar.

Groundwater

Groundwater data has been gathered since 1986, and summarized in various reports over the years. Groundwater Tables are attached. Monitoring Wells are located in various source areas as listed:

Source Area – A – MW-2, MW-2A, MW-10, MW-11, MW-12, MW-13, and MW-14

Source Area – B – MW-1, MW-9

Source Area – C – MW-3, MW-7, MW-9

Source Area – D – MW-4

No Source Area – MW-5, MW-6, and MW-8

Site Maps

Site maps have been provided from several reports submitted to the EPA over the years:

Environmental Investigation – Dated 4/30/1986 – Initial Investigation

Supplementary Contamination and Monitoring Well Installation – Dated 12/31/1986 – Installation of monitoring wells MW-3 and MW-4. Note that the fill port near MW-2 is labeled "Regular Fill Port. Leaded gasoline was banned in 1978, and Ultramar has no records of operating this UST system. Also, note the addition of a "Motor Oil Tank Fill Port". This is a Telum tank, and its origin and current status are unknown.

Subsurface Evaluation – Dated – 6/19/1990 – Installation of TH1 – TH-4. None of the TH's are located in a source area. Also note the "disabled island" near TH-1. The cause of this is unknown.

Phase II Site Assessment – Dated 7/21/1993 – Installation of SB 1–SB-11, HA-1–HA-12. All SB's are in potential source areas, and set a relative baseline.

Additional Phase II Assessment – Dated – 6/27/1995 – Installation on MW-7 and MW-8, SB-13–SB15. Note the addition of the "Former Diesel Islands" between the Station Building and the Restaurant. This is the first documentation of alleged islands, and may explain the high TPHd soil data from Telum's operations.

Unleaded Product Line Assessment – Dated – 10/2/1995 – Note the location of the assessment samples compared to that of SB-9. The data from SB-9 (2 years prior) is significantly more than this assessment.

UST Removal Report – Dated – 12/5/1996 – Note that the four tanks were never operated by Ultramar, and had significant TPHd concentrations in T3, and T4.

Soil Boring Report – Dated 9/26/1996 – Note BTEX was not sampled in this area and TPHd was elevated in at least one sample. This island is located near the noted “Former Diesel Islands”.

MW-10 through MW-14 Installation Report – Dated 8/22/2005 – Note that this assessment is located around Source Area A which was not operated by Ultramar.

Workplan

As discussed, Ultramar is not the only Responsible Party at this Site, and are not aware that any other parties performing corrective actions as a result of their respective obligations at the Site. To assist the EPA in their efforts to understand this Site and the history, Ultramar is planning to conduct the following activities:

Gauge, sample, and survey all existing monitoring wells for gasoline and diesel constituents.

Prepare a new Site plan that reflects the current Site layout. Include additional Site plans detailing the location of all historical soil and groundwater samples as well as gradient contours.

Submit all data in an updated report format.

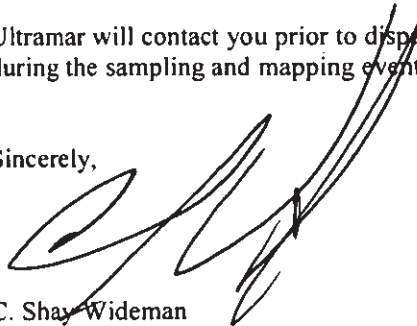
Conclusion

Based on the data we have reviewed to date, there is strong evidence that the original release was caused by historical operations, including but not necessarily limited to Telum as reported in 1986. Data gathered from that date have indicated that Telum's impacts have been substantial and widespread. Ultramar is formally requesting that the EPA pursue Telum or Speedy's as the primary Responsible Party for corrective actions at the Site. Ultramar will agree to cooperate to the extent possible, but cannot agree to lead the corrective actions at the Site given the historical data presented in this summary, and the alleged contamination caused by the existing operations.

We request the data gathered from the UST facility inspection recently conducted by NNEPA, as well as the Administrative Order that has been issued to the current operator.

Ultramar will contact you prior to dispatching our consultant to the Site so you have the option of being present during the sampling and mapping event.

Sincerely,



C. Shay Wideman
Director – Environmental Liability Management

cc:

Steven C. Linder - Underground Storage Tanks Program Office - U.S. EPA
Henry Haven - Environmental Department Manager - NNEPA

Chronology

DATE PREPARED	REPORT/DOCUMENT NAME	PREPARED FOR	DATE PREPARED	Work Done
3/1/1986	Bingo Management and Telum, Inc. enter into PSA with Ultramar			
4/30/1986	Environmental Investigation	Beacon Oil Company and Telum, Inc.	4/30/1986	MW-1, MW-2, MW-3 Borings
4/30/1986	Release Reported as a result of Environmental Investigation Report			
5/21/1986	PSA amended through Supplemental Agreement			
7/23/1986	Proposal Subsurface Environmental Investigation to Delineate Contamination	Telum, Inc.	7/23/1986	
7/23/1986	Proposal Subsurface Environmental Investigation to Delineate Contamination	Telum, Inc.	7/23/1986	
12/31/1986	Supplementary Contamination Investigation and Monitoring Well Installation	Telum, Inc.	12/31/1986	MW-3, Mw-4
3/31/1987	Water Well Chemical Analyses and Hydrocarbon Attenuation	Telum, Inc.	3/31/1987	
3/30/1988	Ground-Water Monitoring	Telum, Inc.	3/30/1988	sample MW-1 to 4
8/19/1988	Letter from Navajo NEPA regarding comments on review done	John Knight-Telum, Inc	8/19/1988	
9/8/1988	Letter regarding Environmental Work at Bingo Truckstop	Brad E. Dingee-Dept. of Water Management	9/8/1988	
2/10/1989	NNEPA issues No Further Action (Later Revoked by EPA)			
3/14/1990	EPA Region 9 overturns NNEPA NEA Letter			
6/19/1990	Subsurface Evaluation	Bingo Truck Stop	6/19/1990	4 borings, sample water well
5/9/1991	Five Year Escrow extended one additional year			
8/12/1991	Site Evaluation	Randall K. Stephenson-Ultramar, Inc.	8/12/1991	
9/16/1991	Bingo/Telum and Ultramar entered into a Performance Bond with specific deliverables			
12/10/1991	Analytical Results	USEPA-Office of UST	12/10/1991	
7/10/1992	Ultramar demands payment from the Bond Company due to the fact that Bingo/Telum failed to meet their contractual obligations.			
4/23/1992	Letter from AET (Telum) requesting tank testing.	Beacon Oil Company		MW-5 and 6 sampled
7/21/1993	Phase II Site Ass. Report	Beacon Oil		11 SB's, 11 HA's
11/22/1993	Beacon Truckstop #51-12-Tankology tank and/or line tests, detector tests	Michael Montgomery-USEPA Region IX	11/22/1993	
9/22/1994	Beacon Truckstop #51-12-Tankology Corp., Inc.'s tank, line, and leak detector tests results	Michael Montgomery-USEPA Region IX	9/22/1994	
6/27/1995	Additional Phase II Site Assessment and Semi-Annual Monitoring Report	Randall K. Stephenson-Ultramar, Inc.	6/27/1995	MW-7, 8&9,

DATE PREPARED	REPORT/DOCUMENT NAME	PREPARED FOR	DATE PREPARED	Work Done
8/16/1995	Ultramar reports a line leak (FOLLOW UP)			
9/12/1995	Beacon Truckstop #51-12 - UST System Testing	Walter Guggenheimer H-W-4-USEPA Region	9/12/1995	
9/20/1995	Letter regarding NDE's line and leak detector test results	Walter Guggenheimer H-W-4-USEPA Region	9/20/1995	
10/2/1995	Unleaded Gasoline Product Line Assessment	Randall K. Stephenson-Ultramar, Inc.	10/2/1995	
4/24/1996	Ultramar sells facility to Savoy Trading Co. (Speedy's) - Closing Date			
6/14/1996	First Semiannual 1996 Monitoring Report	Randall K. Stephenson-Ultramar, Inc.	6/14/1996	
8/1/1996	Letter to Navajo EPA giving 30 day notice on installment of 2 Xerxes gas tanks	Navajo NEPA	8/1/1996	
9/16/1996	Fax to Navajo NEPA regarding visit from Speedy's Truck Stop	Navajo NEPA	9/16/1996	
9/20/1996	Notes - Speedy's Truck Stop		9/20/1996	
9/21/1996	Savoy's Contractual Obligation date to conduct Capital Improvements (UST Replacement)			
10/20/1996	Speedy's removes UST's and begins replacement construction			
10/22/1996	Letter to Navajo EPA giving notice on removal of UST on 10/30/96	Navajo NEPA	10/22/1996	
10/23/1996	Letter to Bruce Nicholson regarding summary of current requirements for tank removals	Bruce Nicholson	10/23/1996	
12/5/1996	Second Semiannual 1996 Monitoring Report	Walter Guggenheimer H-W-4-USEPA Region	12/5/1996	
12/5/1996	Underground Storage Tank Removals	Terry Fox, R.G. - Ultramar, Inc.	12/5/1996	UST soil sampling
2/25/1997	Site Assessment Workplan - Former UST Basins	Terry Fox, R.G. - Ultramar, Inc.	2/25/1997	
2/25/1997	Soil Stockpile Sampling and Corrective Action Plan	Terry Fox, R.G. - Ultramar, Inc.	2/25/1997	
2/25/1997	Soil Stockpile Sampling and Corrective Action Plan & Site Assessment Workplan	Terry Fox, R.G. - Ultramar, Inc.	2/25/1997	
2/25/1997	Soil Stockpile Sampling and Correction Action Plan w/attachments	Terry Fox, R.G. - Ultramar, Inc.	2/25/1997	
3/26/1997	Copy of UST Removal Report by Navajo NEPA UST Program		3/26/1997	
3/26/1997	Copy of UST Installation Report - Navajo NEPA		3/26/1997	
2/18/1998	Groundwater Monitoring Report	Terrance Fox, R.G.-Ultramar, Inc.	2/18/1998	
3/12/1998	Notification for UST - EPA Form		3/12/1998	
2/18/1999	Semi-Annual Groundwater Monitoring Report	Walter Guggenheimer H-W-4-USEPA Region	2/18/1999	

DATE PREPARED	REPORT/DOCUMENT NAME	PREPARED FOR	DATE PREPARED	Work Done
2/18/1999	Semi-Annual Groundwater Monitoring Report	Walter Guggenheimer H-W-4-USEPA Region	2/18/1999	
4/24/1999	Contamination discovered after this date is the responsibility of Savoy (Speedy's)			
10/12/1999	Semi-Annual Ground Water Monitoring Report, 1st Half 1999	Terrance Fox, R.G.-Ultramar, Inc.	10/12/1999	
11/30/2000	Copy of Semi-Annual Ground Water Monitoring Report	Michelle Morris-Navajo EPA	11/30/2000	
2/14/2001	Semi-Annual Groundwater Monitoring Report	Michelle Morris-Navajo EPA	2/14/2001	
7/25/2001	Semi-Annual Ground Water Monitoring Report, 1st Half 2001	Robert Fishburn-Ultramar, Inc.	7/25/2001	
9/24/2001	Letter only-Copy of Semi-Annual Ground Water Monitoring Report, 1st Half 2001	Michelle Morris-Navajo EPA	9/24/2001	
8/27/2002	Semiannual Report Summarizing Groundwater Sampling Activities	Robert Fishburn-Ultramar, Inc.	8/27/2002	
9/9/2002	Letter only-Copy of Semiannual Report Summarizing Groundwater Sampling Activities	Henry Haven, Geologist-Navajo Nation Env	9/9/2002	
2/14/2003	Groundwater Assessment Work Plan	Walter Guggenheimer H-W-4-USEPA Region	2/14/2003	
10/29/2003	Site Groundwater Investigation Report and Groundwater Sampling Activities	Robert Fishburn-Ultramar, Inc.	10/29/2003	MW-2A, 6 hydroponch
12/12/2003	Semiannual Report Summarizing Groundwater Sampling Activities	Robert Fishburn-Ultramar, Inc.	12/12/2003	
3/29/2004	Letter from Burgess & Niple - Analytical Laboratory Report	Laura L. Malone-Hazardous Waster Inspecti	3/29/2004	
4/29/2004	Letter from Burgess & Niple regarding action items requested by EPA	Walter Guggenheimer H-W-4-USEPA Region	4/29/2004	
4/29/2004	Letter from Burgess & Niple regarding action items requested by EPA	Walter Guggenheimer H-W-4-USEPA Region	4/29/2004	
3/17/2005	Letter from Burgess & Niple regarding proposed monitor/treatment well locations	Mark Nicholson	3/17/2005	
8/22/2005	Former Beacon Truck Stop #12652 - Analytical Results Attachments	Walter Guggenheimer H-W-4-USEPA Region	8/22/2005	MW10 to 14.
4/20/2006	Groundwater Sampling Activities in the Vicinity of the Former UST pit	Henry Haven, Geologist-Navajo Nation Env	4/20/2006	
12/8/2006	Status of Leaking Underground Storage Tank (LUST) Sites Overseen Jointly	Arlene Luther, Director-Waste Management	12/8/2006	
3/20/2008	Site Assessment Report	Warren Roan-Navajo NEPA	3/20/2008	4 borings Speedy line

Binge Truck Stop
Lupton, Arizona
Soil Summary Table

Date	Sample ID	Report	Area	Area Description	Depth	Benzene	Toluene	Ethylbenzene	Xylene	MTBE	TBC	THPH	TPH _g	TPH _h	C10-C12	C12-C13	Notes
4/29/1986	S-10-B1	Environmental Investigation	Unleaded UST (in Use) Source	Unleaded UST (in Use) Source	B	10	300	700	100	NS	21,000	NS	NS	NS			
4/29/1986	S-15-MW1	Environmental Investigation	Unleaded UST (in Use) Source	Unleaded UST (in Use) Source	B	15	0	300	0	NS	2,000	NS	NS	NS			Product odor noted in 12-17' interval
4/29/1986	S-20-B3	Environmental Investigation	Near Large Diesel Tank on North End of Property	Near Large Diesel Tank on North End of Property	D	20	< 50	< 50	< 50	NS	< 50	NS	NS	NS			Noted stringers give off strong hydrocarbon odor
4/29/1986	S-20-MW2	Environmental Investigation	Regular UST (1 of 4 in Use) Source Area	Regular UST (1 of 4 in Use) Source Area	A	30	273,000	391,000	693,000	NS	4,675,000	NS	NS	NS			Strong product odor noted
4/29/1986	S-25-B2	Environmental Investigation	Near Above Ground Diesel Tank at West End of Diesel Fueling Canopy	Near Above Ground Diesel Tank at West End of Diesel Fueling Canopy	C	25	< 50	1,300	600	NS	3,900	NS	NS	NS			Strong product odor noted throughout boring
4/29/1986	S-30-B2	Environmental Investigation	Near Above Ground Diesel Tank at West End of Diesel Fueling Canopy	Near Above Ground Diesel Tank at West End of Diesel Fueling Canopy	C	30	< 50	< 50	< 50	NS	< 50	NS	NS	NS			Product odor throughout boring, did not encounter water @ 31'
4/29/1986	S-30-B3	Environmental Investigation	Near Above Ground Diesel Tank at West End of Diesel Fueling Canopy	Near Above Ground Diesel Tank at West End of Diesel Fueling Canopy	D	30	< 50	100	< 50	NS	100	NS	NS	NS			Noted stringers give off strong hydrocarbon odor
4/29/1986	S-35-MW2	Environmental Investigation	Regular UST (1 of 4 in Use) Source Area	Regular UST (1 of 4 in Use) Source Area	A	35	119,000	271,000	38,000	NS	2,300,000	NS	NS	NS			Strong product odor noted
4/29/1986	S-45-B1	Environmental Investigation	Unleaded UST (in Use) Source Area	Unleaded UST (in Use) Source Area	B	45	< 50	200	< 50	NS	200	NS	NS	NS			Water noted on bore log at 41'. May be saturated sample below water table
4/29/1986	S-55-MW1	Environmental Investigation	Unleaded UST (in Use) Source Area	Unleaded UST (in Use) Source Area	B	55	300	200	0	NS	500	NS	NS	NS			
4/29/1986	S-55-MW2	Environmental Investigation	Regular UST (1 of 4 in Use) Source Area	Regular UST (1 of 4 in Use) Source Area	A	55	600	2,500	3,400	NS	9,600	NS	NS	NS			No product odor noted
12/21/1986	S-30-MW3	Supplementary Contamination Investigation and Monitoring Well Installation	Near Above Ground Diesel Tank at West End of Diesel Fueling Canopy	Near Above Ground Diesel Tank at West End of Diesel Fueling Canopy	C	30	NS	NS	NS	NS	< 50	NS	NS	NS			
12/21/1986	S-30-MW4	Supplementary Contamination Investigation and Monitoring Well Installation	Near Large Diesel Tank on North End of Property	Near Large Diesel Tank on North End of Property	D	30	NS	NS	NS	NS	< 50	NS	NS	NS			Strong Product Odor noted throughout boring. Sample taken below noted odor.
7/18/1990	TH-1	Subsurface Evaluation	15-20' from Piping Trench Termination	15-20' from Piping Trench Termination	B	30	< 200	< 200	< 200	NS	NS	NS	NS	NS			Saturated Invalid Sample - Product Odor noted throughout some borings - Sample were bottom samples below measured water table
7/18/1990	TH-2	Subsurface Evaluation	South Property - Not in valid location for soil assessment	South Property - Not in valid location for soil assessment	Non-Source	31	< 200	< 200	< 200	NS	NS	NS	NS	NS			Saturated Invalid Sample - Product Odor noted throughout some borings - Sample were bottom samples below measured water table
7/18/1990	TH-2	Subsurface Evaluation	South Property - Not in valid location for soil assessment	South Property - Not in valid location for soil assessment	Non-Source	38	< 200	< 200	< 200	NS	NS	NS	NS	NS			Saturated Invalid Sample - Product Odor noted throughout some borings - Sample were bottom samples below measured water table
7/18/1990	TH-2	Subsurface Evaluation	South Property - Not in valid location for soil assessment	South Property - Not in valid location for soil assessment	Non-Source	33	< 200	< 200	< 200	NS	NS	NS	NS	NS			Saturated Invalid Sample - Product Odor noted throughout some borings - Sample were bottom samples below measured water table
7/18/1990	TH-3	Subsurface Evaluation	South Property - Not in valid location for soil assessment	South Property - Not in valid location for soil assessment	Non-Source	38	< 200	< 200	< 200	NS	NS	NS	NS	NS			Saturated Invalid Sample - Product Odor noted throughout some borings - Sample were bottom samples below measured water table
7/18/1990	TH-3	Subsurface Evaluation	South Property - Not in valid location for soil assessment	South Property - Not in valid location for soil assessment	Non-Source	38	< 200	< 200	< 200	NS	NS	NS	NS	NS			Saturated Invalid Sample - Product Odor noted throughout some borings - Sample were bottom samples below measured water table
7/18/1990	TH-4	Subsurface Evaluation	Near B1 and MW1	Near B1 and MW1	B	38	< 200	< 200	< 200	NS	NS	NS	NS	NS			Saturated Invalid Sample - Product Odor noted throughout some borings - Sample were bottom samples below measured water table
Oct-91	MW-5	??	??	??													
Oct-91	MW-6	??	??	??													
6/22/1993	HA10	Phase II Site Assessment Report	Near Large Diesel Tank on North End of Property	Near Large Diesel Tank on North End of Property	D	3	NS	NS	NS	NS	NS	610,000	NS	181,000			
6/22/1993	HA11	Phase II Site Assessment Report	Near Large Diesel Tank on North End of Property	Near Large Diesel Tank on North End of Property	D	3	NS	NS	NS	NS	NS	< 20,000	NS	< 30,000			
6/22/1993	HA12	Phase II Site Assessment Report	Along trench in 1-40 ROW	Along trench in 1-40 ROW	E	3	NS	NS	NS	NS	NS	< 20,000	NS	< 30,000			
6/22/1993	HA5-1-0.5	Phase II Site Assessment Report	Behind Warehouse	Behind Warehouse	F	0.5	NS	NS	NS	NS	NS	300,000	NS	53,000			
6/22/1993	HA6-1-5	Phase II Site Assessment Report	Near Aboveground Diesel Tank installed by other parties at north end of Diesel Island	Near Aboveground Diesel Tank installed by other parties at north end of Diesel Island	C	5	NS	NS	NS	NS	NS	410,000	NS	NS			
6/22/1993	HA7-1-5	Phase II Site Assessment Report	Near Aboveground Diesel Tank installed by other parties at north end of Diesel Island	Near Aboveground Diesel Tank installed by other parties at north end of Diesel Island	C	5	NS	NS	NS	NS	NS	34,000,000	NS	NS			
6/22/1993	HA8-1-5.5	Phase II Site Assessment Report	Near Aboveground Diesel Tank installed by other parties at north end of Diesel Island	Near Aboveground Diesel Tank installed by other parties at north end of Diesel Island	C	5.5	NS	NS	NS	NS	NS	< 20,000	NS	< 30,000			

Date	Sample ID	Report	Area	Area Description	Depth	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE	TBC	THF	C4-C9		C10-C12		C13-C15		Notes
													TPH	TPH	TPH	TPH	TPH	TPH	
6/22/1993	HA9-1-3	Phase II Site Assessment Report	Near Large Diesel Tank on North End of Property	D	3	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 30,000	< 30,000	< 30,000	< 30,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB10-1-10	Phase II Site Assessment Report	Diesel Island - end of pipe from Diesel Tank	C	10	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB10-2-20	Phase II Site Assessment Report	Diesel Island - end of pipe from Diesel Tank	C	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB11-1-25	Phase II Site Assessment Report	Near Aboveground Diesel Tank installed by other parties at north end of Diesel Island	C	25	NS	NS	NS	NS	NS	NS	NS	NS	NS	17,000,000	17,000,000	17,000,000	17,000,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB1-1-5	Phase II Site Assessment Report	Diesel Island 1 - Near MW-4	C	5	NS	NS	NS	NS	NS	NS	NS	NS	NS	1,600,000	1,600,000	1,600,000	1,600,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB1-2-10	Phase II Site Assessment Report	Diesel Island 1 - Near MW-4	C	10	NS	NS	NS	NS	NS	NS	NS	NS	NS	110,000	110,000	110,000	110,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB1-3-15	Phase II Site Assessment Report	Diesel Island 1 - Near MW-4	C	15	NS	NS	NS	NS	NS	NS	NS	NS	NS	22,000	22,000	22,000	22,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB1-4-20	Phase II Site Assessment Report	Diesel Island 1 - Near MW-4	C	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	24,000	24,000	24,000	24,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB1-5-25	Phase II Site Assessment Report	Diesel Island 1 - Near MW-4	C	25	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB1-6-30	Phase II Site Assessment Report	Diesel Island 1 - Near MW-4	C	30	NS	NS	NS	NS	NS	NS	NS	NS	NS	824,000	824,000	824,000	824,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB2-1-5	Phase II Site Assessment Report	Diesel Island 2	C	5	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB2-2-10	Phase II Site Assessment Report	Diesel Island 2	C	10	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB2-3-15	Phase II Site Assessment Report	Diesel Island 2	C	15	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB2-4-20	Phase II Site Assessment Report	Diesel Island 2	C	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB2-5-25	Phase II Site Assessment Report	Diesel Island 2	C	25	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB3-1-5	Phase II Site Assessment Report	Diesel Island 3	C	5	NS	NS	NS	NS	NS	NS	NS	NS	NS	6,700,000	6,700,000	6,700,000	6,700,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB3-2-10	Phase II Site Assessment Report	Diesel Island 3	C	10	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB3-3-15	Phase II Site Assessment Report	Diesel Island 3	C	15	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB3-4-20	Phase II Site Assessment Report	Diesel Island 3	C	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB3-5-25	Phase II Site Assessment Report	Diesel Island 3	C	25	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB3-6-30	Phase II Site Assessment Report	Diesel Island 3	C	30	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB4-1-5	Phase II Site Assessment Report	Diesel Island 4	C	5	NS	NS	NS	NS	NS	NS	NS	NS	NS	25,000	25,000	25,000	25,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB4-2-10	Phase II Site Assessment Report	Diesel Island 4	C	10	NS	NS	NS	NS	NS	NS	NS	NS	NS	29,000	29,000	29,000	29,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB4-3-15	Phase II Site Assessment Report	Diesel Island 4	C	15	NS	NS	NS	NS	NS	NS	NS	NS	NS	340,000	340,000	340,000	340,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB4-4-20	Phase II Site Assessment Report	Diesel Island 4	C	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	35,000	35,000	35,000	35,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB5-1-5	Phase II Site Assessment Report	Diesel Island 5	C	5	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB5-2-10	Phase II Site Assessment Report	Diesel Island 5	C	10	NS	NS	NS	NS	NS	NS	NS	NS	NS	1,600,000	1,600,000	1,600,000	1,600,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB5-3-15	Phase II Site Assessment Report	Diesel Island 5	C	15	NS	NS	NS	NS	NS	NS	NS	NS	NS	78,000	78,000	78,000	78,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB5-4-20	Phase II Site Assessment Report	Diesel Island 5	C	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	26,000	26,000	26,000	26,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB6-1-5	Phase II Site Assessment Report	Diesel Island 6	C	5	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB6-2-10	Phase II Site Assessment Report	Diesel Island 6	C	10	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB6-3-15	Phase II Site Assessment Report	Diesel Island 6	C	15	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB6-4-20	Phase II Site Assessment Report	Diesel Island 6	C	20	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB7-1-5	Phase II Site Assessment Report	North of Large Above Diesel Storage Tanks	D	5	NS	NS	NS	NS	NS	NS	NS	NS	NS	6,700,000	6,700,000	6,700,000	6,700,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB7-2-10	Phase II Site Assessment Report	North of Large Above Diesel Storage Tanks	D	10	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SB7-3-15	Phase II Site Assessment Report	North of Large Above Diesel Storage Tanks	D	15	NS	NS	NS	NS	NS	NS	NS	NS	NS	< 20,000	< 20,000	< 20,000	< 20,000	Diesel Odor Noted in all SB Borings

Date	Sample ID	Report	Area	Area Description	Depth	Recess	Tolence	Rhyolite	Xylene	MTBE	THC	TPH	TPH	TPH	Notes
6/22/1993	SBT-4-20	Phase II Site Assessment Report	North of Large Above Diesel Storage Tanks	D	20	NS	NS	NS	NS	NS	NS	< 20,000	NS	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SBT-5-25	Phase II Site Assessment Report	North of Large Above Diesel Storage Tanks	D	25	NS	NS	NS	NS	NS	NS	< 20,000	NS	< 20,000	Diesel Odor Noted in all SB Borings
6/22/1993	SBT-1-5	Phase II Site Assessment Report	Unleaded UST (In Use) Source Area	B	5	NS	NS	NS	NS	NS	NS	NS	NS	NS	Diesel Odor Noted in all SB Borings
6/22/1993	SBT-2-10	Phase II Site Assessment Report	Unleaded UST (In Use) Source Area	B	10	NS	NS	NS	NS	NS	NS	NS	NS	NS	Diesel Odor Noted in all SB Borings
6/22/1993	SBT-3-15	Phase II Site Assessment Report	Unleaded UST (In Use) Source Area	B	15	NS	NS	NS	NS	NS	NS	NS	NS	NS	Diesel Odor Noted in all SB Borings
6/22/1993	SBT-4-20	Phase II Site Assessment Report	Unleaded UST (In Use) Source Area	B	20	300	180	ND	ND	NS	NS	NS	ND	NS	Diesel Odor Noted in all SB Borings
6/22/1993	SBT-5-25	Phase II Site Assessment Report	Unleaded UST (In Use) Source Area	B	25	870	670	92	230	NS	NS	< 20,000	14,000	NS	Diesel Odor Noted in all SB Borings
6/22/1993	SBT-6-30	Phase II Site Assessment Report	Unleaded UST (In Use) Source Area	B	30	NS	NS	NS	NS	NS	NS	< 20,000	NS	NS	Diesel Odor Noted in all SB Borings
6/22/1993	SBT-6-35	Phase II Site Assessment Report	Unleaded UST (In Use) Source Area	B	35	NS	NS	NS	NS	NS	NS	< 20,000	NS	NS	Diesel Odor Noted in all SB Borings
6/22/1993	SBT-1-5	Phase II Site Assessment Report	Unleaded UST (In Use) Source Area	B	5	NS	NS	NS	NS	NS	NS	830,000	NS	NS	Diesel Odor Noted in all SB Borings
6/22/1993	SBT-2-10	Phase II Site Assessment Report	Unleaded UST (In Use) Source Area	B	10	5,500	29,000	11,000	66,000	NS	NS	690,000	1,100,000	NS	Diesel Odor Noted in all SB Borings
6/22/1993	SBT-3-15	Phase II Site Assessment Report	Unleaded UST (In Use) Source Area	B	15	9,300	92,000	30,000	?	NS	NS	744,000	3,100,000	NS	Diesel Odor Noted in all SB Borings
6/22/1993	HA1	Phase II Site Assessment Report	Diesel Island - end of pipe trench near I-40 - Oil Water Separator	E		No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
6/22/1993	HA2	Phase II Site Assessment Report	Along trench in I-40 ROW	E		No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
6/22/1993	HA3	Phase II Site Assessment Report	Along trench in I-40 ROW	E		No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
6/22/1993	HA4	Phase II Site Assessment Report	Along trench in I-40 ROW	E		No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
3/10/1995	HA13-10	Additional Phase II Site Assessment	Near Diesel Pumping house (insulated surface area)	Non-Source	10	< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 5,000	< 20,000	
3/10/1995	HA13-5	Additional Phase II Site Assessment	Near Diesel Pumping house (insulated surface area)	Non-Source	5	< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 5,000	< 20,000	
3/10/1995	MW-7 (SB12-15)	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	15	< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 5,000	< 20,000	
3/10/1995	MW-7 (SB12-20)	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	20	< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 5,000	< 20,000	
3/10/1995	MW-7 (SB12-25)	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	25	< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 5,000	250,000	
3/10/1995	MW-7 (SB12-30)	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	30	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/1995	MW8 (SB16-15)	Additional Phase II Site Assessment	On far northeast side of site. Non-here near a source area.	Non-Source	15	< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 5,000	< 20,000	
3/10/1995	MW8 (SB16-20)	Additional Phase II Site Assessment	On far northeast side of site. Non-here near a source area.	Non-Source	20	< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 5,000	< 20,000	
3/10/1995	MW8 (SB16-25)	Additional Phase II Site Assessment	On far northeast side of site. Non-here near a source area.	Non-Source	25	< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 5,000	< 20,000	
3/10/1995	MW8 (SB16-27)	Additional Phase II Site Assessment	On far northeast side of site. Non-here near a source area.	Non-Source	27	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/1995	MW9 (SB17-10)	Additional Phase II Site Assessment	Between Former unleaded Gasoline Islands and Diesel Island in parking lot	B/C	10	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/1995	MW9 (SB17-15)	Additional Phase II Site Assessment	Between Former unleaded Gasoline Islands and Diesel Island in parking lot	B/C	15	63	< 50	< 50	< 50	< 50	< 50	< 50	< 5,000	< 20,000	
3/10/1995	MW9 (SB17-20)	Additional Phase II Site Assessment	Between Former unleaded Gasoline Islands and Diesel Island in parking lot	B/C	20	< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 5,000	< 20,000	
3/10/1995	MW9 (SB17-25)	Additional Phase II Site Assessment	Between Former unleaded Gasoline Islands and Diesel Island in parking lot	B/C	25	< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 5,000	< 20,000	
3/10/1995	MW9 (SB17-30)	Additional Phase II Site Assessment	Between Former unleaded Gasoline Islands and Diesel Island in parking lot	B/C	30	< 50	< 50	< 50	< 50	< 50	< 50	< 50	< 5,000	< 20,000	

Date	Sample ID	Report	Area	Area Designation	Depth	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE	TBC	TPH	CLP9 TPH	CLP10-C12 TPH	Notes
3/10/1995	SB13-15	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	15	<50	<50	<50	<50	<50	<50	<50	<5,000	<20,000	
3/10/1995	SB13-20	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	20	<50	<50	<50	<50	<50	<50	<50	<5,000	<20,000	
3/10/1995	SB13-25	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	25	<50	<50	<50	<50	<50	<50	<50	<5,000	<20,000	
3/10/1995	SB13-27.5	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	27.5	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/1995	SB14-20	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	20	<50	<50	<50	<50	<50	<50	<50	<5,000	<20,000	
3/10/1995	SB14-25	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	25	<50	<50	<50	<50	<50	<50	<50	<5,000	<20,000	
3/10/1995	SB14-27	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	27	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/1995	SB15-15	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	15	<50	<50	<50	<50	<50	<50	<50	<5,000	<20,000	
3/10/1995	SB15-20	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	20	<50	<50	<50	<50	<50	<50	<50	<5,000	<20,000	
3/10/1995	SB15-25	Additional Phase II Site Assessment	Near Former Diesel AST (current NW corner of new building)	C	25	<50	<50	<50	<50	<50	<50	<50	<5,000	<20,000	
8/17/1995	AB1-10	Underground Product Line Assessment	Excavated Product Trench Area	B	10	2,900	18,000	4,900	27,000	NS	NS	NS	350,000	NS	
8/17/1995	AB1-7.5	Underground Product Line Assessment	Excavated Product Trench Area	B	7.5	5,800	51,000	20,000	120,000	NS	NS	NS	1,100,000	NS	
8/17/1995	AB2-10	Underground Product Line Assessment	Excavated Product Trench Area	B	10	650	7,000	2,700	19,000	NS	NS	NS	360,000	NS	
8/17/1995	AB2-7.5	Underground Product Line Assessment	Excavated Product Trench Area	B	7.5	830	6,600	2,400	16,000	NS	NS	NS	250,000	NS	
9/19/1996	L01	Soil Boring Report - Pre-New Gas Disp/Tankhold	Southwest corner of New Gasoline Tankhold	A	15	NS	NS	NS	NS	NS	NS	NS	<10000	95,000	
9/20/1996	L02	Soil Boring Report - Pre-New Gas Disp/Tankhold	East End of New UST Tankhold	A	15	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/26/1996	L03	Soil Boring Report - Pre-New Gas Disp/Tankhold	Under Southwest New Gasoline Tankhold	A	NA	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/26/1996	L04	Soil Boring Report - Pre-New Gas Disp/Tankhold	Under Northwest New Gasoline Tankhold	A	NA	NS	NS	NS	NS	NS	NS	NS	<10000	33,000	
9/26/1996	L05	Soil Boring Report - Pre-New Gas Disp/Tankhold	Under Northeast New Gasoline Tankhold	A	NA	NS	NS	NS	NS	NS	NS	NS	<10000	NS	
9/26/1996	L06	Soil Boring Report - Pre-New Gas Disp/Tankhold	Under Southwest New Gasoline Tankhold	A	NA	NS	NS	NS	NS	NS	NS	NS	<200000	2,200,000	Detection limit of 200,000 at C1-9 range due to concentration of diesel in sample.
10/20/1996	T1-N-15	UST Removal Report	North End Tank 1	A	15	<50	<100	<100	51,000	NS	NS	NS	NS	NS	Soil staining in base of excavation. Backfill removed.
10/20/1996	T1-S-15	UST Removal Report	South End Tank 1	A	15	<50	880	770	470,000	NS	NS	NS	NS	NS	Soil staining in base of excavation. Backfill removed.
10/20/1996	T1-S-20	UST Removal Report	South End Tank 1	A	20	14,000	29,000	<100	90,000	NS	NS	NS	NS	NS	Soil staining in base of excavation. Backfill removed.
10/20/1996	T1-S-24	UST Removal Report	South End Tank 1	A	24	<50	<100	<100	<150	NS	NS	NS	NS	NS	Soil staining in base of excavation. Backfill removed.
10/20/1996	T2-N-15	UST Removal Report	North End Tank 2	A	15	<50	<100	<100	<150	NS	NS	NS	NS	NS	Soil staining in base of excavation. Backfill removed.
10/20/1996	T2-S-15	UST Removal Report	South End Tank 2	A	15	<50	<100	<100	<150	NS	NS	NS	NS	NS	Soil staining in base of excavation. Backfill removed.
10/20/1996	T2-S-15	UST Removal Report	South End Tank 3	A	15	<50	<100	<100	<150	NS	NS	NS	NS	NS	Soil staining in base of excavation. Backfill removed.
10/20/1996	T2-N-15	UST Removal Report	North End Tank 3	A	15	<50	<100	<100	<150	NS	NS	NS	NS	NS	Soil staining in base of excavation. Backfill removed.
10/20/1996	T2-N-15	UST Removal Report	South End Tank 4	A	15	<50	<100	<100	<150	NS	NS	NS	NS	NS	Soil staining in base of excavation. Backfill removed.
10/20/1996	T2-S-15	UST Removal Report	South End Tank 4	A	15	<50	<100	<100	<150	NS	NS	NS	NS	NS	Soil staining in base of excavation. Backfill removed.
10/31/1996	Temp SPI-1 & SPI-1	UST Removal Report	Stockpile Sample	B	NA	<50	<100	<100	2,100	NS	NS	NS	NS	NS	
10/31/1996	Temp SPI-2 & SPI-1	UST Removal Report	Stockpile Sample	B	NA	<50	<100	<100	380	NS	NS	NS	NS	NS	
10/31/1996	Temp SPI-2 & SPI-1	UST Removal Report	Stockpile Sample	B	NA	<50	250	260	500	NS	NS	NS	NS	NS	Backfill returned to hole.
10/31/1996	T5-S-11	UST Removal Report	North End Tank 5	B	11	<50	<100	<100	370	NS	NS	NS	NS	NS	Backfill returned to hole.
10/31/1996	T6-S-11	UST Removal Report	South End Tank 5	B	11	110	<50	<100	370	NS	NS	NS	NS	NS	Backfill returned to hole.
10/31/1996	T6-S-11	UST Removal Report	North End Tank 6	B	11	750	680	<100	2,600	NS	NS	NS	NS	NS	Backfill returned to hole.
10/31/1996	T6-S-11	UST Removal Report	South End Tank 6	B	11	<50	<100	<100	4,150	NS	NS	NS	NS	NS	Backfill returned to hole.
10/31/1996	T7-S-11	UST Removal Report	North End Tank 7	B	11	1,900	16,000	6,500	85,000	NS	NS	NS	NS	NS	Backfill returned to hole.
10/31/1996	T7-S-11	UST Removal Report	South End Tank 7	B	11	1,900	16,000	6,500	85,000	NS	NS	NS	NS	NS	Backfill returned to hole.
10/31/1996	T8-S-11	UST Removal Report	North End Tank 8	B	11	350	<100	440	160,000	NS	NS	NS	NS	NS	Backfill returned to hole.

Blanco Truck Stop
Lupton, Arizona
Soil Summary Table

Date	Sample ID	Report	Area	Area Designation	Depth	Recharge	Taberna	Exfiltration	X-flow	MTBE	TBC	TPH	TPH ₂	TPH ₃	C10-C12	C14-C9	C17-C12	Notes
10/31/1996	TS-5-11	UST Removal Report	South End Tank 8	B	11	<50	<100	<100	300	NS	NS	NS	NS	NS				Backfill returned to hole.
3/29/2005	BN-02-15	MW-10 through MW-14 Insulation Report	Off the southwest corner of Tank 2	A	15	130	<100	270	<150	<200	NS	NS	NS	NS	550,000	62,000	550,000	No boring logs included in the report.
3/29/2005	BN-02-30	MW-10 through MW-14 Insulation Report	Off the southwest corner of Tank 2	A	30	6,400	22,000	6,400	36,000	2,600	NS	NS	NS	NS	220,000	680,000	220,000	
3/30/2005	BN-03-15	MW-10 through MW-14 Insulation Report	Off the southwest corner of Tank 1	A	15	30,000	9,700	200,000	720,000	16,000	NS	NS	NS	NS	21,000,000	17,000,000	21,000,000	660,000
3/30/2005	BN-03-30	MW-10 through MW-14 Insulation Report	Off the southwest corner of Tank 1	A	30	6,800	29,000	8,000	47,000	2,900	NS	NS	NS	NS	150,000	880,000	150,000	<50,000
3/31/2005	BN-04-15	MW-10 through MW-14 Insulation Report	Off the northwest corner of Tank 1	A	15	2,000	<1000	8,700	12,000	<200	NS	NS	NS	NS	1,400,000	650,000	1,400,000	<50,000
3/31/2005	BN-04-30	MW-10 through MW-14 Insulation Report	Off the northwest corner of Tank 1	A	30	3,300	600	4,100	4,600	2,100	NS	NS	NS	NS	90,000	360,000	90,000	<50,000
3/31/2005	BN-05-15	MW-10 through MW-14 Insulation Report	Off the northwest corner of Tank 2	A	15	130	<100	790	630	<200	NS	NS	NS	NS	6,200,000	400,000	6,200,000	160,000
3/31/2005	BN-05-30	MW-10 through MW-14 Insulation Report	Off the northwest corner of Tank 2	A	30	17,000	62,000	16,000	79,000	6,200	NS	NS	NS	NS	2,300,000	1,800,000	2,300,000	<50,000
4/1/2005	BN-06-10	MW-10 through MW-14 Insulation Report	East of Tank 1 and South of Gas Disrupters	A	10	210	110	210	570	<200	NS	NS	NS	NS	16,000	23,000	16,000	<50,000
4/1/2005	BN-06-15	MW-10 through MW-14 Insulation Report	East of Tank 1 and South of Gas Disrupters	A	15	510	<100	<100	<150	<200	NS	NS	NS	NS	32,000	16,000	32,000	<50,000
4/1/2005	BN-06-30	MW-10 through MW-14 Insulation Report	East of Tank 1 and South of Gas Disrupters	A	30	140,000	440,000	120,000	580,000	70,000	NS	NS	NS	NS	1,400,000	12,000,000	1,400,000	<50,000

Groundwater Table

Bingo Truck Stop
Exit 359, Grant Road and Interstate 40
Lupton, Arizona
Groundwater Analytical Testing Results

Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-1	04/25/86	70	500	2	20	---	---	---	---	---	1,700
	12/31/86	7	7	< 5.0	4	---	---	---	---	---	85
	07/13/90	7	< 5.0	< 5.0	< 5.0	---	---	---	---	---	---
	11/27/90	1	< 5.0	< 5.0	< 5.0	---	---	---	---	1,200	37
	07/25/91	1	< 5.0	< 5.0	< 5.0	---	---	---	---	< 50.0	< 50.0
	06/25/93	< 5.0	< 5.0	< 5.0	< 5.0	---	< 5.0	---	---	< 50.0	< 50.0
	11/30/93	< 5.0	< 5.0	< 5.0	< 5.0	---	< 5.0	---	---	---	---
	03/15/94	< 5.0	< 5.0	< 5.0	< 5.0	---	< 500	---	---	---	---
	07/22/94	3	< 5.0	< 5.0	< 5.0	---	---	---	---	< 50.0	< 50.0
	03/29/95	1	< 5.0	< 5.0	< 5.0	---	---	---	---	< 100.0	< 50.0
	07/18/95	1	< 1.0	< 1.0	< 2.0	---	---	---	---	< 50.0	< 50.0
	03/21/96	1	< 5.0	< 5.0	< 5.0	---	---	---	---	< 100.0	< 10.0
	12/11/97	Well Abandoned									
	12/11/97	Well Abandoned									
Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-2	04/25/86	5,000	11,200	1,100	9,000	---	---	---	---	---	38,000
	12/31/86	537	121	196	382	---	---	---	---	---	3,580
	07/13/90	550	1	ND	ND	---	---	---	---	---	---
	11/27/90	330	34	33	28	---	---	---	---	1,700	930
	06/25/93	100	< 0.5	< 0.5	< 0.5	---	< 5.0	---	---	< 50.0	< 50.0
	11/30/93	240	1	20	ND	---	< 5.0	---	---	---	---
	03/15/94	2,500	35	190	ND	---	---	---	---	---	---
	07/22/94	680	11	48	12	---	700	---	---	0	2,000
	03/29/95	230	8	15	< 7.5	---	---	---	---	< 10.0	1,200
	07/18/95	440	19	42	6	---	---	---	---	< 50.0	14
	03/21/96	310	9	24	< 10.0	---	---	---	---	< 10.0	1,300
	10/17/96	420	< 10.0	33	< 30	---	---	---	---	440	< 1000
	12/11/97	Well Abandoned									
	12/11/97	Well Abandoned									
Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-2A	06/24/03	630	1,500	360	2,100	< 10.0	---	---	---	---	---
	04/09/05	7	< 2.0	< 2.0	< 3.0	310	---	---	---	---	---
Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-3	12/31/86	---	---	---	---	---	---	---	---	---	---
	07/13/90	< 0.5	< 0.5	< 0.5	< 0.5	---	---	---	---	---	---
	11/27/90	< 0.5	< 0.5	< 0.5	< 0.5	---	---	---	---	250	< 20
	07/25/91	< 0.5	< 0.5	< 0.5	< 0.5	---	---	---	---	< 50.0	< 500
	06/25/93	< 0.5	< 0.5	< 0.5	< 0.5	---	< 5.0	---	---	< 50.0	< 500
	11/30/93	< 0.5	< 0.5	< 0.5	< 0.5	---	< 5.0	---	---	---	< 500
	03/15/94	< 0.5	< 0.5	< 0.5	< 0.5	---	< 500	---	---	---	< 500
	07/22/94	< 0.5	< 0.5	< 0.5	< 0.5	---	---	---	---	< 50.0	< 500
	03/29/95	< 0.5	< 0.5	< 0.5	< 1.0	---	---	---	---	< 100	< 500
	07/18/95	< 0.5	< 1.0	< 1.0	< 2.0	---	---	---	---	< 100	< 10.0
	03/21/96	< 0.5	< 0.5	< 0.5	< 1.0	---	---	---	---	< 100	< 500
	12/11/97	< 0.5	< 0.5	< 0.5	< 1.0	---	---	---	---	180	---
	07/21/98	< 0.5	< 1.0	< 1.0	< 3.0	---	---	---	---	710	< 500
	12/17/98	< 1.0	< 1.0	< 1.0	< 1.0	---	---	< 200	710	< 500	< 200
	07/06/99	< 0.5	< 1.0	< 1.0	< 1.0	---	---	< 200	< 200	< 500	< 200
	12/16/99	< 0.5	< 1.0	< 1.0	< 1.0	< 0.5	---	< 200	< 200	< 500	---
	08/24/00	< 0.5	< 1.0	< 1.0	< 1.0	< 0.5	---	< 200	< 200	< 500	< 200
	12/19/00	< 0.5	< 1.0	< 1.0	< 1.0	< 0.5	---	< 200	< 200	< 500	< 200
	05/31/01	< 0.5	< 1.0	< 1.0	< 1.0	< 0.5	---	< 200	< 200	< 500	< 200
	12/18/01	< 1.0	7	< 2.0	8	< 5.0	---	< 200	< 200	< 500	< 200
	06/26/02	< 1.0	< 2.0	< 2.0	< 3.0	< 5.0	---	< 100	< 100	< 200	< 200
	01/03/03	---	---	---	---	---	---	---	---	---	---
Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-4	12/31/86	---	---	---	---	---	---	---	---	---	---
	07/13/90	< 5.0	< 0.5	< 0.5	< 0.5	---	---	---	---	---	---
	11/27/90	2	1	< 0.5	1	---	---	---	---	350	47
	07/25/91	1	< 0.5	< 0.5	< 0.5	---	---	---	---	890	150
	06/25/93	< 5.0	< 0.5	< 0.5	< 0.5	---	2,000	---	---	20,050	< 50.0
	11/30/93	1	< 0.5	< 0.5	< 0.5	---	< 5.0	---	---	---	---
	03/15/94	< 5.0	< 0.5	< 0.5	< 0.5	---	< 500	---	---	---	---
	07/22/94	3	1	< 0.5	1	---	---	---	---	390	250
	03/29/95	6	< 0.5	< 0.5	< 1.0	---	---	---	---	< 100	61
	07/18/95	3	< 1.0	< 1.0	< 2.0	---	---	---	---	110	< 100
	03/21/96	5	< 0.5	< 0.5	< 1.0	---	---	---	---	1,100	< 50.0
	10/17/96	6	< 0.5	< 0.5	< 0.5	---	---	---	---	< 100	0
	12/11/97	3	< 0.5	< 0.5	< 1.0	---	---	---	---	260	---

07/21/98	6	< 1.0	< 1.0	< 3.0	---	---	< 200	280	< 500	< 500
12/17/98	2	< 1.0	< 1.0	< 1.0	---	---	< 200	< 200	< 500	< 200
07/06/99	1	< 1.0	< 1.0	2	---	---	620	1,100	1,700	< 200
12/16/99	< 0.5	< 1.0	< 1.0	< 1.0	< 0.5	---	---	0	< 500	---
08/24/00	< 0.5	< 1.0	< 1.0	< 1.0	< 0.5	---	< 200	< 200	< 500	< 200
12/19/00	6	< 1.0	< 1.0	< 1.0	< 0.5	---	< 200	< 200	< 500	< 200
05/31/01	10	< 1.0	< 1.0	< 1.0	9	---	< 200	< 200	< 500	< 200
12/19/01	4	27	< 2.0	17	< 5.0	---	< 200	< 200	< 500	< 200
06/26/02	2	< 2.0	< 2.0	< 3.0	< 5.0	---	< 100	120	120	< 200
01/03/03	3	< 2.0	< 2.0	< 3.0	< 1.0	---	< 200	380	< 500	< 200

Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-5	10/17/91	< 0.5	< 0.5	< 0.5	< 0.5	---	---	---	---	---	< 50.0
	06/25/93	< 0.5	< 0.5	< 0.5	< 0.5	---	< 500	---	---	< 50.0	< 50.0
	11/30/93	< 0.5	< 0.5	< 0.5	< 0.5	---	< 500	---	---	---	---
	03/14/94	< 0.5	< 0.5	< 0.5	< 0.5	---	< 500	---	---	---	---
	07/22/94	< 0.5	< 0.5	< 0.5	< 0.5	---	---	---	---	< 50.0	---
	03/30/95	< 0.5	< 0.5	< 0.5	< 1.0	---	---	---	---	< 100	< 50.0
	07/18/95	< 0.3	< 1.0	< 1.0	< 2.0	---	---	---	---	< 50.0	< 50.0
	03/21/96	< 0.5	< 0.5	< 0.5	< 1.0	---	---	---	---	< 100	< 50.0
	12/11/97	< 0.5	< 0.5	< 0.5	< 1.0	---	---	---	---	170	< 0.5
	07/21/98	< 1.0	< 1.0	< 1.0	< 3.0	---	---	< 200	< 200	< 50.0	< 500
	12/17/98	< 0.5	< 1.0	< 1.0	< 1.0	---	---	< 200	0	< 50.0	< 200
	07/06/99	< 0.5	< 1.0	< 1.0	< 1.0	---	---	< 200	< 200	< 50.0	< 200
	12/16/99	< 0.5	< 1.0	< 1.0	< 1.0	< 5.0	---	< 200	< 200	< 50.0	---
	08/24/00	< 0.5	< 1.0	< 1.0	< 1.0	2	---	< 200	< 200	< 50.0	< 200
	12/19/00	< 0.5	< 1.0	< 1.0	< 1.0	< 5.0	---	< 200	< 200	< 50.0	< 200
	05/31/01	< 0.5	< 1.0	< 1.0	< 1.0	< 5.0	---	< 200	< 200	< 50.0	< 200
	12/18/01	< 1.0	< 2.0	< 2.0	< 3.0	< 5.0	---	< 200	< 200	< 50.0	< 200
	06/26/02	< 1.0	< 2.0	< 2.0	< 3.0	< 5.0	---	< 100	< 100	< 200	< 200
	01/03/03	---	---	---	---	---	---	---	---	---	---

Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-6	10/17/91	< 0.5	< 0.5	< 0.5	< 0.5	---	---	---	---	---	---
	06/25/93	< 0.5	< 0.5	< 0.5	< 0.5	---	< 0.5	---	---	< 50.0	< 50.0
	11/30/93	< 0.5	< 0.5	< 0.5	< 0.5	---	< 0.5	---	---	---	---
	03/14/94	< 0.5	< 0.5	< 0.5	< 0.5	---	< 0.5	---	---	---	---
	07/22/94	1	1	< 0.5	1	---	---	---	---	< 50.0	150
	03/30/95	7	< 0.5	< 0.5	< 2.0	---	---	---	---	< 100	120
	07/18/95	1	< 1.0	< 0.0003	< 0.5	---	---	---	---	< 50.0	150
	03/21/96	< 0.5	< 0.5	< 0.5	< 0.5	---	---	---	---	< 100	91
	12/11/97	---	---	---	---	---	---	---	---	---	---
	07/21/98	---	---	---	---	---	---	---	---	---	---
	12/17/98	---	---	---	---	---	---	---	---	---	---
	07/06/99	---	---	---	---	---	---	---	---	---	---
	12/16/99	---	---	---	---	---	---	---	---	---	---
	08/24/00	---	---	---	---	---	---	---	---	---	---
	12/19/00	---	---	---	---	---	---	---	---	---	---
	05/31/01	< 0.5	< 1.0	< 1.0	< 1.0	3	---	< 200	< 200	< 500	< 200
	12/19/01	< 1.0	< 2.0	< 2.0	< 3.0	2	---	---	---	---	---
	06/26/02	< 1.0	< 2.0	< 2.0	< 3.0	2	---	< 100	< 100	< 200	---
	01/03/03	---	---	---	---	---	---	---	---	---	---

Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-7	03/29/95	< 0.5	< 0.5	< 0.5	< 1.0	---	---	---	---	< 100	< 50.0
	07/18/95	< 0.5	< 1.0	< 1.0	< 2.0	---	---	---	---	< 50.0	< 50.0
	03/21/96	< 0.5	< 0.5	< 0.5	< 1.0	---	---	---	---	< 100	< 50.0
	12/11/97	---	---	---	---	---	---	---	---	---	---
	07/21/98	---	---	---	---	---	---	---	---	---	---
	07/06/99	---	---	---	---	---	---	---	---	---	---
	12/16/99	---	---	---	---	---	---	---	---	---	---
	08/24/00	---	---	---	---	---	---	---	---	---	---
	12/19/00	---	---	---	---	---	---	---	---	---	---
	05/31/01	< 0.5	< 1.0	< 1.0	< 1.0	< 0.5	---	< 200	< 200	< 500	< 200
	12/18/01	4	10	< 2.0	9	< 5.0	---	---	---	---	---
	06/26/02	< 1.0	< 2.0	< 2.0	< 3.0	< 5.0	---	< 100	< 100	< 200	---
	01/03/03	---	---	---	---	---	---	---	---	---	---

Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-8	03/29/95	8	< 0.5	< 1.0	---	---	---	---	---	< 100	< 50.0
	07/18/95	150	1	2	---	---	---	---	---	< 50.0	75
	03/21/96	13	4	< 1.0	---	---	---	---	---	< 100	130
	10/17/96	9	4	< 1.0	---	---	---	---	---	< 100	65
	12/11/97	6	1	< 1.0	---	---	---	---	---	220	---
	07/21/98	18	5	< 3.0	---	---	---	< 200	< 200	< 500	< 500
	12/17/98	27	< 1.0	< 1.0	---	---	---	< 200	< 200	< 500	< 200
	07/06/99	12	< 1.0	< 1.0	---	---	---	< 200	< 200	< 500	< 200

12/16/99	45	2	2	---	< 5.0	---	< 200	< 200	< 500	---
08/24/00	---	---	---	---	---	---	---	---	---	---
12/19/00	---	---	---	---	---	---	---	---	---	---
05/31/01	11	< 1.0	< 1.0	---	< 200	---	< 200	< 200	< 500	< 200
12/19/01	15	5	< 2.0	6	< 5.0	---	---	---	---	---
06/26/02	29	< 2.0	< 2.0	< 3.0	< 5.0	---	< 100	< 100	< 200	---
01/03/03	111	< 2.0	4	< 3.0	< 1.0	---	< 200	< 200	< 500	250

Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-9	03/29/95	< 0.5	2	< 0.5	< 1.0	---	---	---	---	< 100	< 50.0
	07/18/95	< 0.5	< 1.0	< 1.0	< 2.0	---	---	---	---	< 50.0	< 100
	03/21/96	< 0.5	< 0.5	< 0.5	< 1.0	---	---	---	---	< 100	< 500
	12/11/97	< 0.5	< 0.5	< 0.5	< 1.0	---	---	---	---	0.2	---
	07/21/98	< 1.0	< 1.0	< 1.0	< 3.0	---	---	< 200	< 200	< 500	< 500
	12/17/98	< 0.5	< 1.0	< 1.0	< 1.0	---	---	< 200	< 200	< 500	< 200
	07/06/99	< 0.5	< 1.0	< 1.0	2	---	---	< 200	< 200	< 500	< 200
	12/16/99	< 0.5	< 1.0	< 1.0	< 1.0	< 5.0	---	< 200	< 200	< 500	---
	08/24/00	< 0.5	< 1.0	< 1.0	< 1.0	< 5.0	---	< 200	< 200	< 500	< 200
	12/19/00	< 0.5	< 1.0	< 1.0	< 1.0	< 5.0	---	< 200	< 200	< 500	< 200
	05/31/01	< 0.5	< 1.0	< 1.0	< 1.0	< 5.0	---	< 100	< 100	< 200	< 200
	12/18/01	2	25	< 2.0	2	< 5.0	---	< 200	< 200	< 500	< 200
	06/26/02	< 1.0	< 2.0	< 2.0	< 3.0	< 5.0	---	< 100	< 100	< 500	< 200
	01/03/03	---	---	---	---	---	---	---	---	---	---

Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-10	04/09/05	12,000	12,000	1,300	8,900	< 200.00	---	---	---	---	---

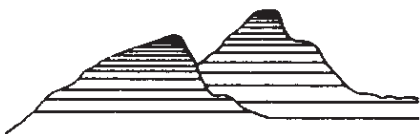
Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-11	04/09/05	23,000	22,000	1,400	10,000	360	---	---	---	---	---

Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-12	04/09/05	GW sample never collected and analysed or PSH since installation date?						---	---	---	---

Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-13	04/09/05	GW sample never collected and analysed or PSH since installation date?						---	---	---	---

Location	Date	Benene	Toluene	Ethyl-benene	Xylenes	MTBE	TRPH	C10-C22	C22-C32	C10-C32	VFH
MW-14	04/09/05	34000	28000	1800	13000	370	---	---	---	---	---

Site Plans



Applied GeoSystems

43255 Mission Blvd. Suite B Fremont, CA 94539 (415) 651-1906

652 Gordon
COPY

REPORT
ENVIROMENTAL INVESTIGATION
at
Bingo Truck Stop
Lupton, Arizona

AGS Job No. 8614-1C

Report prepared for

Beacon Oil Company Co.
Hanford, California 93230
and
Telum, Inc.
Provo, Utah 84601

by

Rodger C. Witham

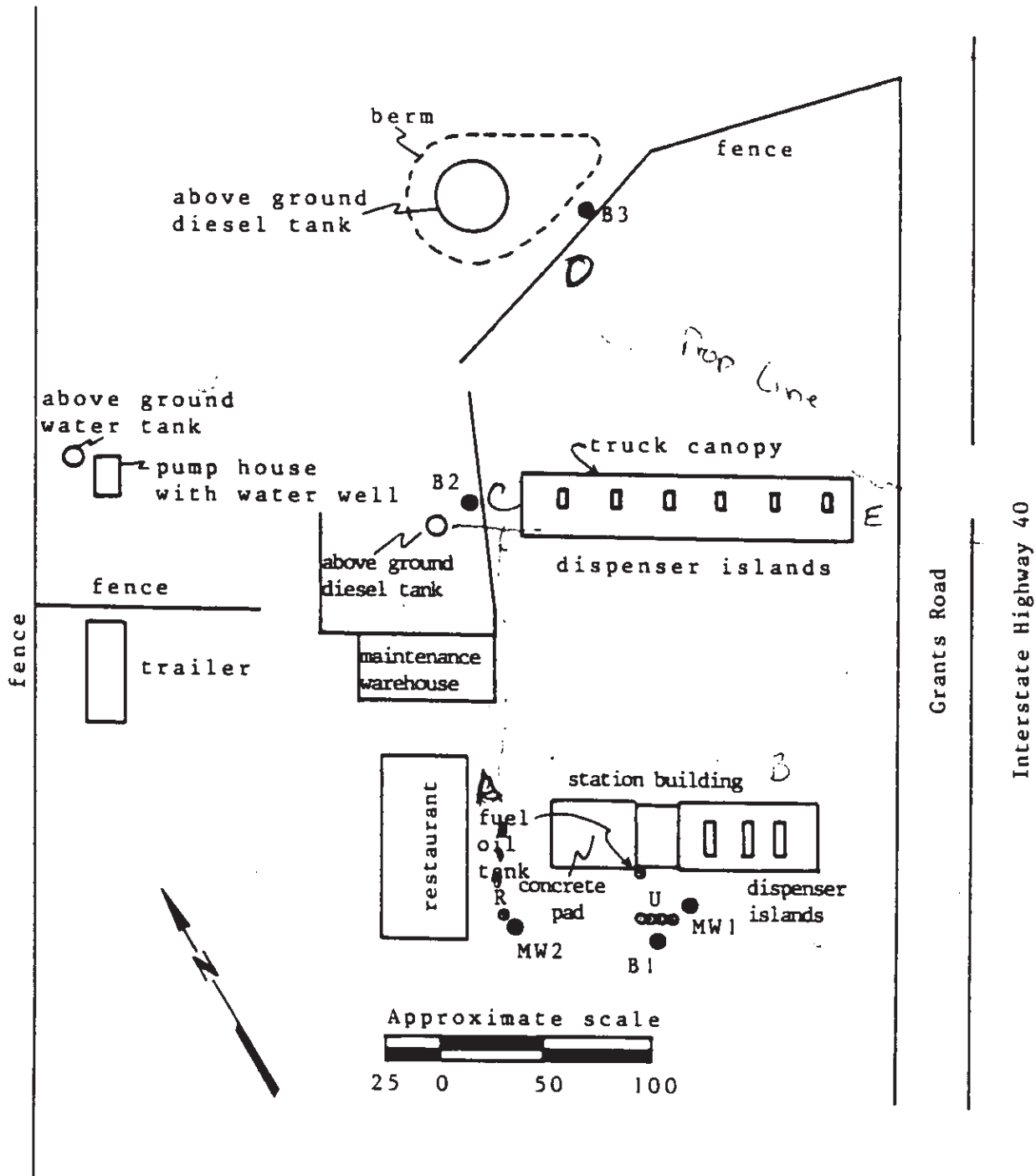
Rodger C. Witham
Project Geologist

Michael N. Clark

Michael N. Clark
C.E.G. 1264

April 30, 1986

BJ012757



→
Inferred ground
water gradient.

Note: Measurements made by tape

- : Soil boring/monitoring well locations
- : Fill ports

BJ012776



43255 Mission Blvd. Suite B Fremont, CA 94539 (415) 651-1906

PROJECT NO. AGS 8614-1C

SITE PLAN
Bingo Truck Stop
Interstate Hwy 40 at Grants Road
Lupton, Arizona

PLATE

P-2



Applied GeoSystems

43255 Mission Blvd. Suite B Fremont, CA 94539 (415) 651-1906

REPORT
SUPPLEMENTARY CONTAMINATION
INVESTIGATION AND
MONITORING WELL INSTALLATION
at Bingo Truckstop
Interstate Highway 40
at Grants Road Exit
Lupton, Arizona

HW-3
or
HW-4

AGS Job No. 8669-1

Prepared for

Telum, Inc.
890 East 650 North
Provo, Utah 84603

by

Rodger C. Witham

Rodger C. Witham
Project Geologist

Michael N. Clark

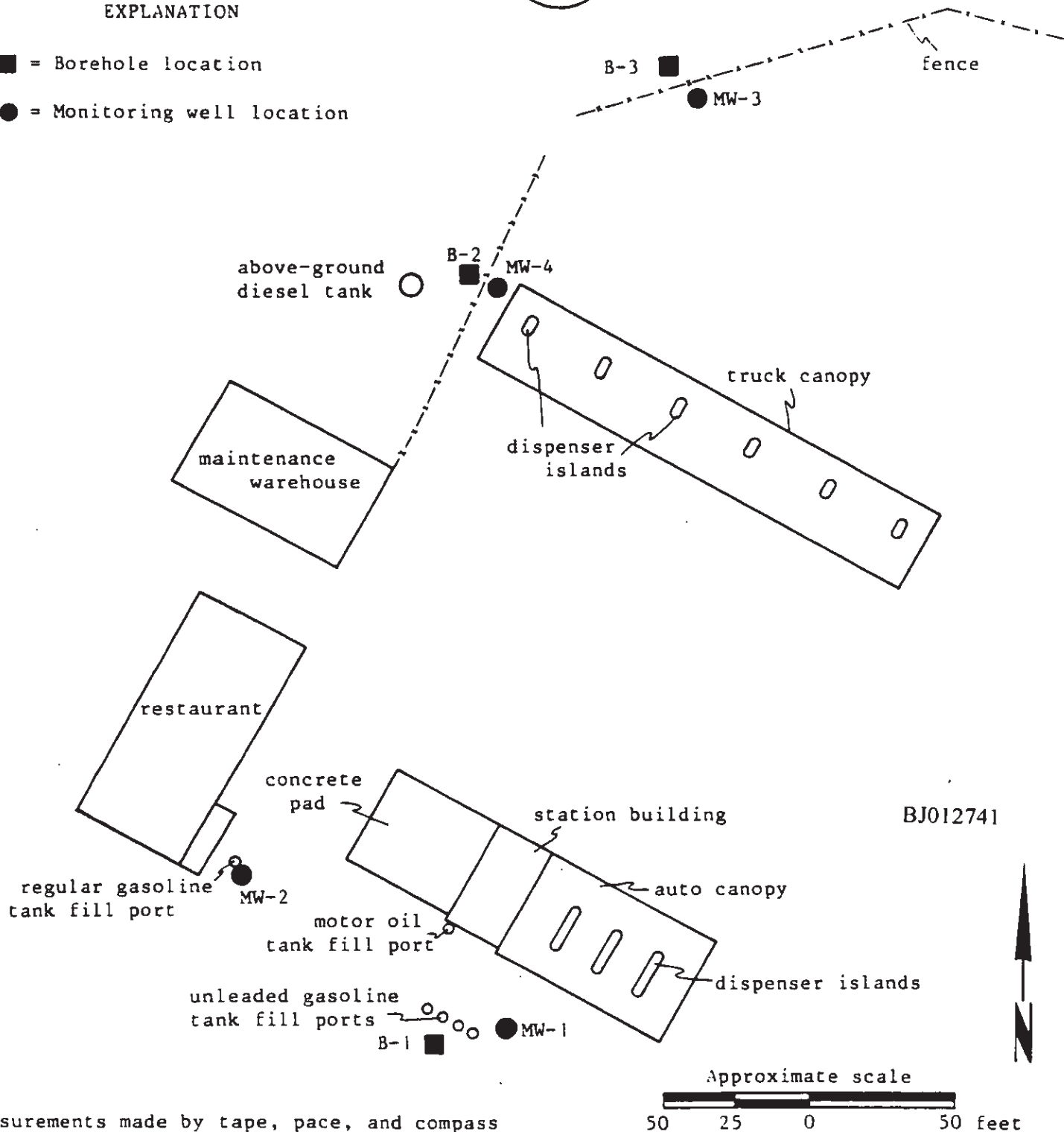
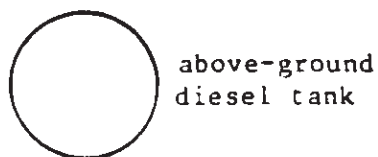
Michael N. Clark
R.P.E. #20045

December 31, 1986

BJ012717

EXPLANATION

- = Borehole location
- = Monitoring well location



Measurements made by tape, pace, and compass

Approximate scale
50 25 0 50 feet



PROJECT NO. AGS 8669-1

GENERALIZED SITE PLAN
BINGO TRUCKSTOP
LUPTON, ARIZONA

PLATE

P-2

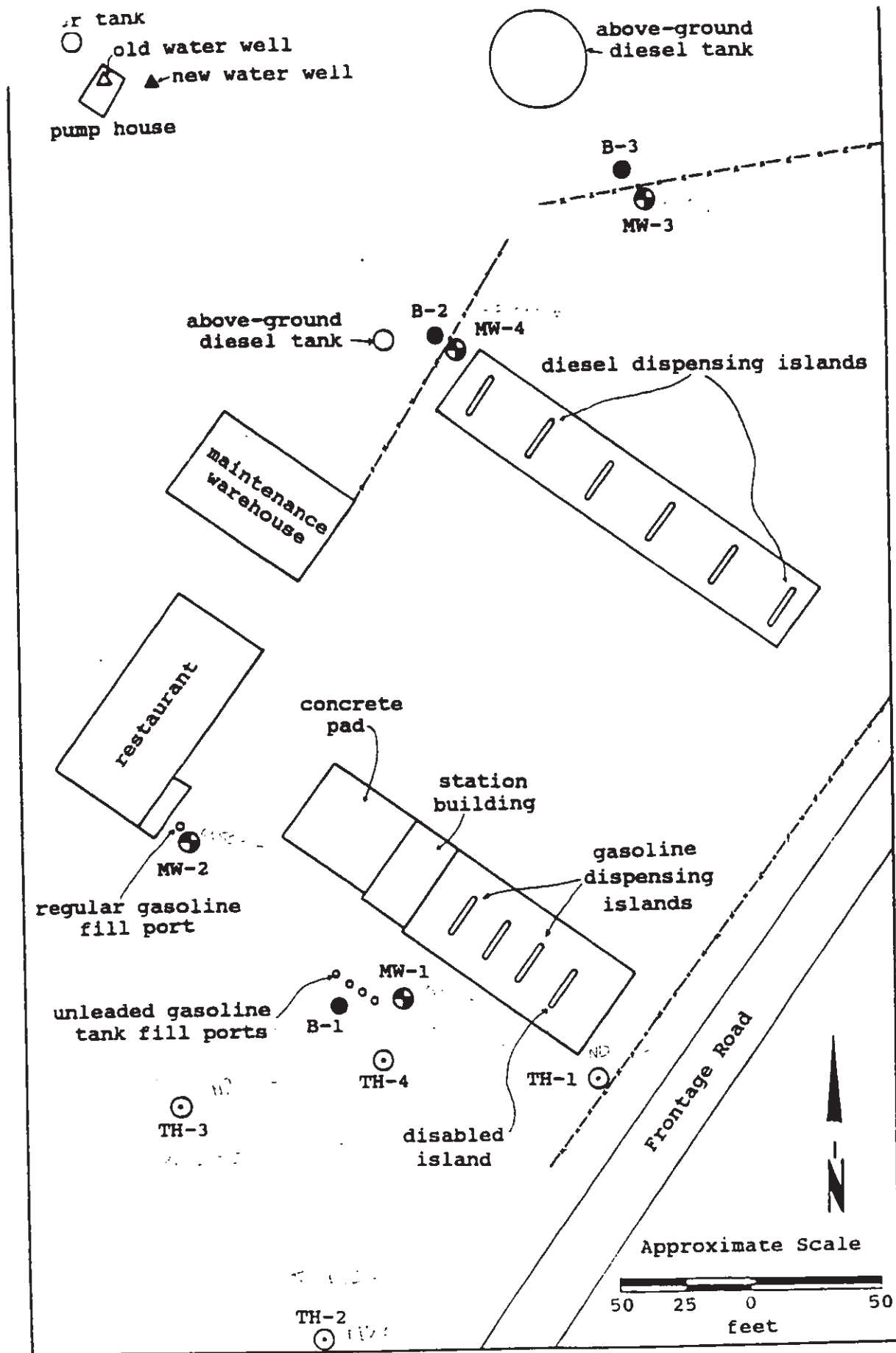
SUBSURFACE EVALUATION
PREPARED FOR
BINGO TRUCK STOP, LUPTON, ARIZONA
JULY 19, 1990

BY

A handwritten signature in dark ink, appearing to read 'Clyde Fredrickson', is written over a horizontal line.

CLYDE FREDRICKSON, PRESIDENT
CHMM # 2076

BS010331



Map 2 - Site plan showing facilities and locations of borings (B-1 through B-3), monitoring wells (MW-1 through MW-4), and test holes (TH-1 through TH-4, this study). Adapted from AGS Report No. 8669-2.

PHASE II SITE ASSESSMENT REPORT

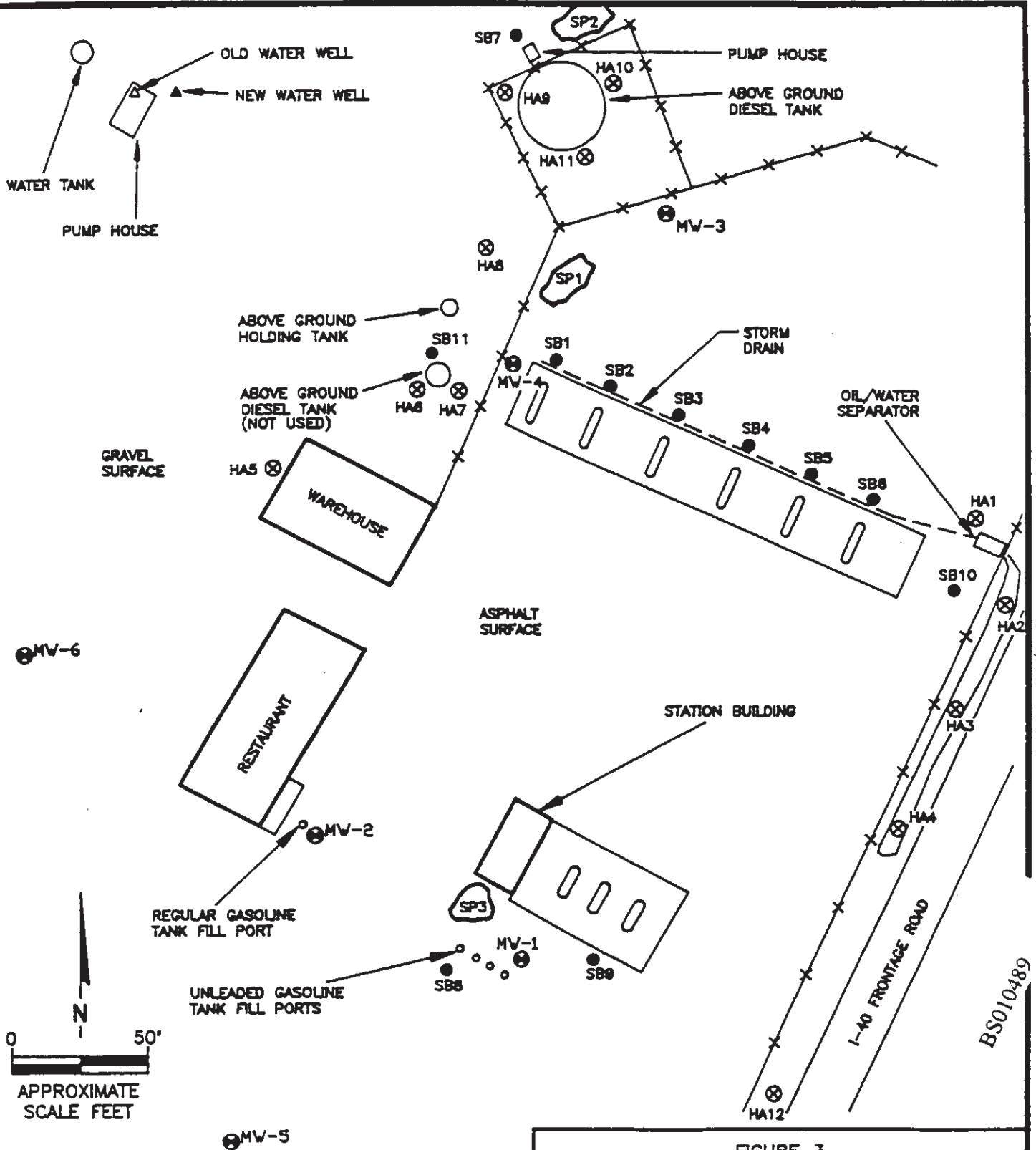
BEACON TRUCK STOP NO. 652

EXIT 359, GRANT ROAD and INTERSTATE HIGHWAY 40

LUPTON, ARIZONA

DELTA NO. 31-93-103

BS010460



LEGEND

- MONITORING WELL LOCATION
- SOIL BORING LOCATION
- ⊗ HAND AUGER LOCATION
- SP1 COVERED SOIL STOCKPILE

FIGURE 3

SOIL BORING LOCATION MAP
BEACON FACILITY #652
LUPTON, ARIZONA

PROJECT NO. 31-93-103	DRAWN BY A. KRUSE
FILE NO. 103-01	PREPARED BY B. LAW
DATE	REV. REVIEWED BY



RECEIVED

JUL 05 1995

ADDITIONAL PHASE II SITE ASSESSMENT AND
SEMI-ANNUAL MONITORING REPORT

BEACON TRUCK STOP NO. 652

EXIT 359, GRANT ROAD AND INTERSTATE HIGHWAY 40

LUPTON, ARIZONA

DELTA NO. H093-103-2.0001

Prepared For:

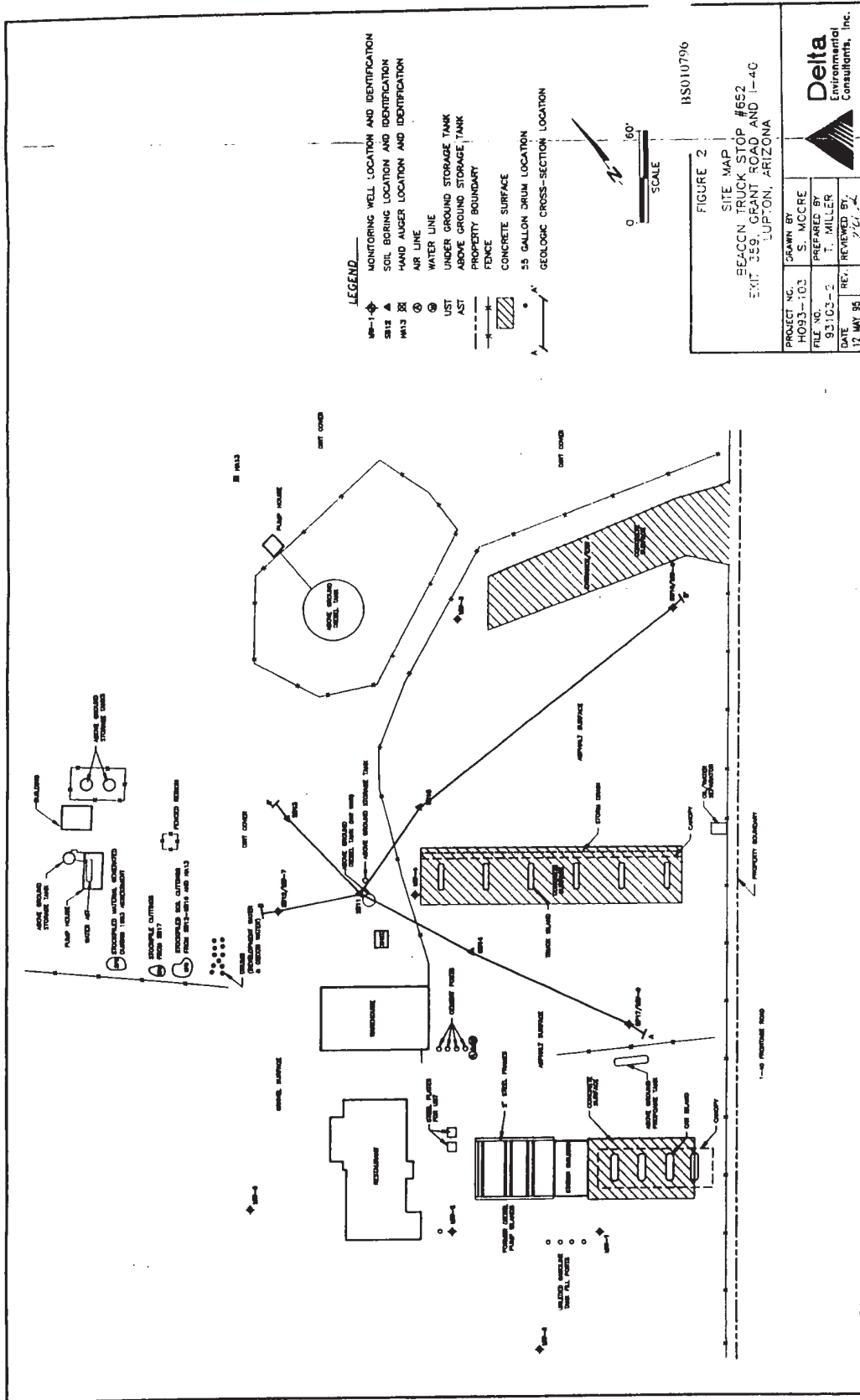
Mr. Randall K. Stephenson
Ultramar Inc.
P.O. Box 466
Hanford, California 93232-0466

Prepared By:

Delta Environmental Consultants, Inc.
11225 North 28th Drive, Suite D-115
Phoenix, Arizona 85029
(602) 866-3469

June 27, 1995

BS010771





RECEIVED

OCT 05 1995

11225 North 28th Drive
Suite D-115
Phoenix, AZ 85029
602/866-3469
FAX: 602/789-9497

October 2, 1995

Mr. Randall K. Stephenson
Environmental Specialist
Ultramar Inc.
525 West Third Street
Hanford, California 93230

Subject: Unleaded Gasoline Product Line Assessment
 Beacon Truck Stop No. 652
 Lupton, Arizona
 Delta No. H093-103

Dear Mr. Stephenson:

This letter report documents the limited assessment activities conducted by Delta Environmental Consultants, Inc. (Delta) at Beacon Truck Stop No. 652 (the site) during the repair of the unleaded gasoline product line. Delta was on-site August 16 and 17, 1995 to observe the product line repair and collect soil samples. Arizona Petroleum Contractors (APC) performed the product line repair.

APC exposed a section of steel product line running along the southwest side of the unleaded gasoline fueling islands. The exposed section of piping was between the two center islands and was approximately 20 feet in length. The excavated area was approximately 25 feet long 2.5 feet wide and 4 feet deep. Soil staining was present on the sidewalls of the excavation along the exposed piping run. Delta collected soil samples beneath the exposed piping where a visible hole was present (shown as AB1 on the attached site map). Delta also collected soil samples beneath the product line elbow (shown as AB2 on the attached site map). The samples were collected at depths of 7.5 and 10 feet below ground surface at both locations using a hand auger. The samples were collected in brass tubes, sealed with teflon sheets, aluminum foil sheets, plastic caps, and duct tape. The samples were labeled, entered on the chain-of-custody, and preserved on ice in a cooler for delivery to the laboratory. A clean pair of nitrile gloves was worn to collect each sample. The hand auger was decontaminated in an alconox/water solution and rinsed in distilled water before each sample was collected.

The samples were analyzed for total petroleum hydrocarbons as gasoline (TPH_G) by EPA Method 8015 (modified, gasoline standard) and for benzene, toluene, ethylbenzene, and total xylenes (BTEX) by EPA Method 8020. The results indicate that the soil in the vicinity of the has been impacted with petroleum hydrocarbons. TPH_G concentrations ranged from 250 to 1,100 milligrams per kilogram (mg/kg) and benzene concentrations ranged from 6.6 to 51 mg/kg. The analytical results are summarized on the attached site map. The analytical report and chain-of-custody record are attached.

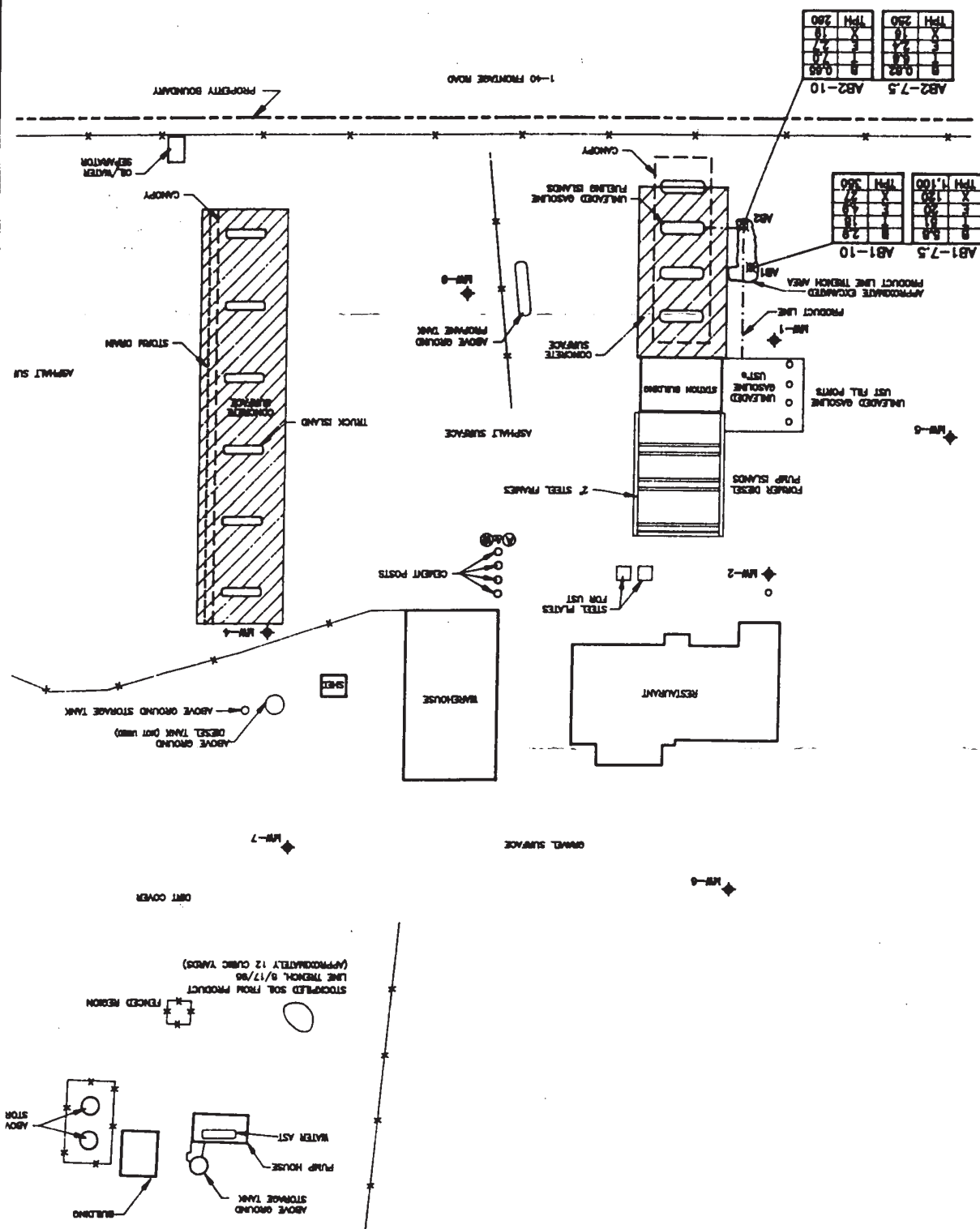
APC replaced the section of piping from the product line elbow to a product line union located approximately three feet northwest of AB1. The soil excavated to expose the product line was stockpiled on and covered with plastic. The location of the stockpiled soil is shown on the attached site map. Import fill material was used to backfill the excavated area.



Delta
Environmental
Consultants, Inc.

PROJECT NO.	DRAWN BY
HC93-103	S. MOORE
FILE NO.	PREPARED BY
93103-2	B. GODFREY
DATE	REVIEWED, BY
26 SEPT 35	<i>[Signature]</i>

CONCENTRATIONS IN MILLIGRAMS PER KILOGRAM (mg/kg)





DEC 09 1996

11225 North 28th Drive
Suite D-115
Phoenix, AZ 85029
602/866-3469
FAX: 602/789-9497

December 5, 1996

Mr. Terry Fox, R. G.
Ultramar, Inc.
525 West Third Street
Hanford, California 93232-0466

Subject: Underground Storage Tank Removals
 Former Beacon Truck Stop No. 652
 Exit 359, Grant Road and Interstate Highway 40
 Lupton, Arizona
 Delta No. H093-103-5
 Navajo EPA Identification No. NAV-1

Dear Mr. Fox:

Delta Environmental Consultants, Inc. (Delta) was contracted by Ultramar, Inc. to collect soil samples following the removal of eight underground storage tanks (USTs) at the above referenced site. The facility is a truck stop formerly owned and operated by Ultramar. A site location map and a site map are included as Figures 1 and 2. The site is currently owned by Speedy's Convenience, Inc. (Speedy's) of Gallup, New Mexico. Speedy's is upgrading the UST systems at the site. As part of this work, Speedy's installed new USTs for storage of gasoline and removed eight existing USTs. AllStar Trading, Inc. (AllStar) was contracted by Speedy's for the removal of the USTs. This report documents field activities, analytical results, and conclusions.

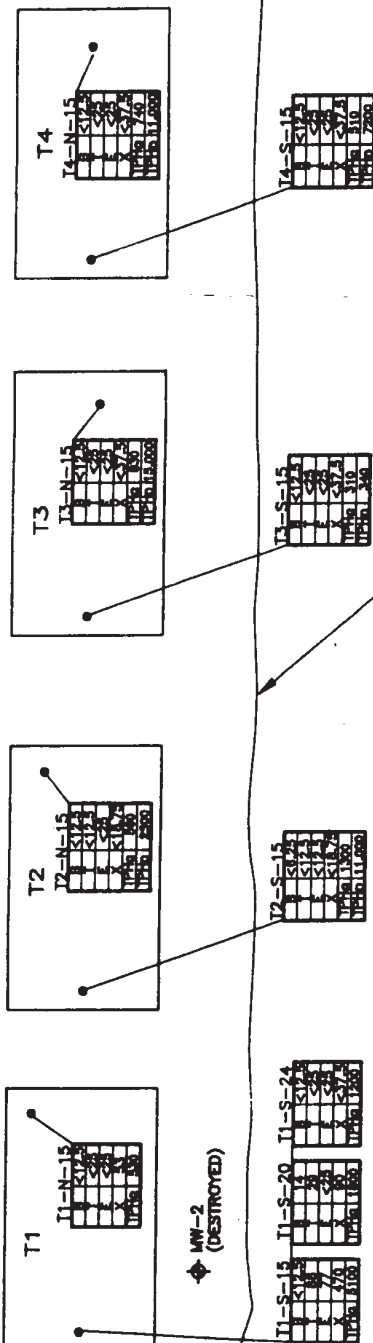
The following scope of work outlines Delta's tasks involved with this project:

- Revised the Site-Specific Health and Safety Plan.
- Observed the removal of eight USTs.
- Collected soil samples beneath eight USTs, in accordance with the Navajo Environmental Protection Agency (NEPA) guidelines and regulations.
- Submitted the samples to an Ultramar contracted laboratory for analysis for total petroleum hydrocarbons as gasoline (TPH_G) by EPA Method 8015 Modified (gasoline standard); for total petroleum hydrocarbons as diesel fuel (TPH_D) by EPA Method 8015 Modified (diesel fuel standard); and benzene, toluene, ethylbenzene, and total xylenes (BTEX) by EPA Method 8020.
- Prepared this report summarizing the field activities and laboratory results.

UST Removals

On October 30 & 31, 1996, a representative from Delta was on site to observe the removal of eight single-wall, steel USTs (identified as T1 - T8) and to collect soil samples following each removal. T1 - T4 and T5 - T8 were located in separate tank basins. The location of the tank basins are shown on Figure 2. AllStar removed residual product from the USTs and placed it into an above ground storage tank located at the site.

RESTAURANT



ASPHALT SURFACE
EXCAVATION BOUNDARY

LEGEND

- T1 UNDERGROUND STORAGE TANK IDENTIFICATION
- GROUNDWATER MONITORING WELL
- SOIL SAMPLE LOCATION
- T2-S-15 SAMPLE ID AND DEPTH
- BENZENE
- TOLUENE
- ETHYLBENZENE
- TOTAL XYLENES
- TOTAL PETROLEUM HYDROCARBONS AS GASOLINE
- TOTAL PETROLEUM HYDROCARBONS AS DIESEL FUEL
- EPA METHOD 8015
- EPA METHOD 8020
- ALL CONCENTRATIONS IN MILLIGRAMS PER KILOGRAM

FIGURE 3

UNDERGROUND STORAGE TANKS T1-T4
BEACON TRUCK STOP #652
EXIT 359, GRANT ROAD AND I-40
LUPTON, ARIZONA

PROJECT NO.	H093-103	DRAWN BY	S. MOORE
FILE NO.	93103-E1	PREPARED BY	R. SANDERS
DATE	25 NOV 98	REV.	0
		REVIEWED BY	



BS010209

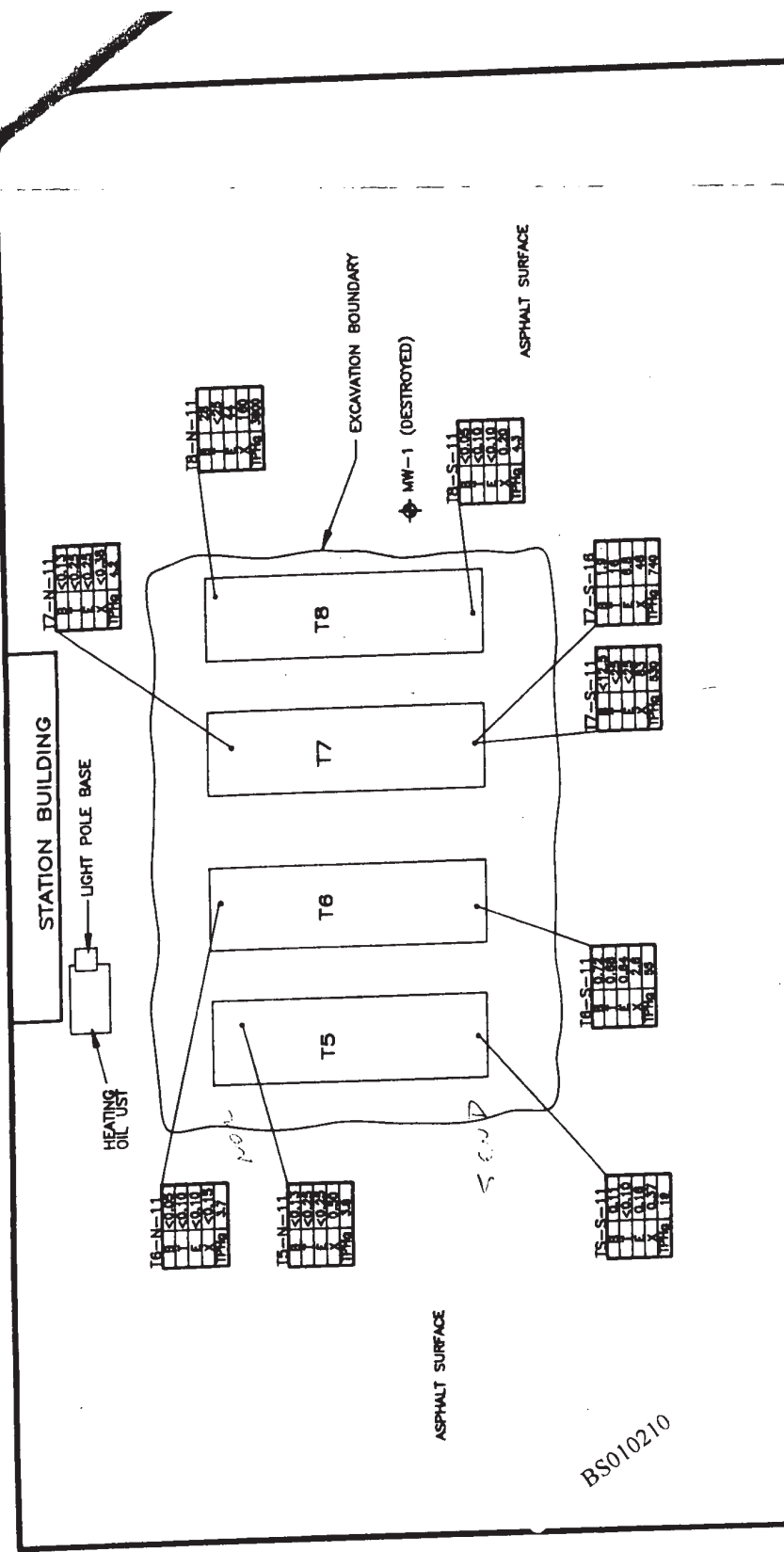


FIGURE 4

UNDERGROUND STORAGE TANKS T5-T8
 BEACON TRUCK STOP #652
 EXIT 359, GRANT ROAD AND I-40
 LUPTON, ARIZONA

PROJECT NO.	H093-103	DRAWN BY	S. MOORE
FILE NO.	93103-E2	PREPARED BY	R. SANDERS
DATE	25 NOV 98	REV.	0
		REVIEWED BY	<i>[Signature]</i>

Delta
 Environmental
 Consultants, Inc.

- LEGEND**
- T5 UNDERGROUND STORAGE TANK IDENTIFICATION
 - MONITORING WELL
 - SOIL SAMPLE LOCATION
 - T5-S-11 SAMPLE ID AND DEPTH
 - | | |
|-----|------|
| 1 | 0.11 |
| 2 | 0.10 |
| 3 | 0.10 |
| 4 | 0.10 |
| 5 | 0.10 |
| 6 | 0.10 |
| 7 | 0.10 |
| 8 | 0.10 |
| 9 | 0.10 |
| 10 | 0.10 |
| 11 | 0.10 |
| 12 | 0.10 |
| 13 | 0.10 |
| 14 | 0.10 |
| 15 | 0.10 |
| 16 | 0.10 |
| 17 | 0.10 |
| 18 | 0.10 |
| 19 | 0.10 |
| 20 | 0.10 |
| 21 | 0.10 |
| 22 | 0.10 |
| 23 | 0.10 |
| 24 | 0.10 |
| 25 | 0.10 |
| 26 | 0.10 |
| 27 | 0.10 |
| 28 | 0.10 |
| 29 | 0.10 |
| 30 | 0.10 |
| 31 | 0.10 |
| 32 | 0.10 |
| 33 | 0.10 |
| 34 | 0.10 |
| 35 | 0.10 |
| 36 | 0.10 |
| 37 | 0.10 |
| 38 | 0.10 |
| 39 | 0.10 |
| 40 | 0.10 |
| 41 | 0.10 |
| 42 | 0.10 |
| 43 | 0.10 |
| 44 | 0.10 |
| 45 | 0.10 |
| 46 | 0.10 |
| 47 | 0.10 |
| 48 | 0.10 |
| 49 | 0.10 |
| 50 | 0.10 |
| 51 | 0.10 |
| 52 | 0.10 |
| 53 | 0.10 |
| 54 | 0.10 |
| 55 | 0.10 |
| 56 | 0.10 |
| 57 | 0.10 |
| 58 | 0.10 |
| 59 | 0.10 |
| 60 | 0.10 |
| 61 | 0.10 |
| 62 | 0.10 |
| 63 | 0.10 |
| 64 | 0.10 |
| 65 | 0.10 |
| 66 | 0.10 |
| 67 | 0.10 |
| 68 | 0.10 |
| 69 | 0.10 |
| 70 | 0.10 |
| 71 | 0.10 |
| 72 | 0.10 |
| 73 | 0.10 |
| 74 | 0.10 |
| 75 | 0.10 |
| 76 | 0.10 |
| 77 | 0.10 |
| 78 | 0.10 |
| 79 | 0.10 |
| 80 | 0.10 |
| 81 | 0.10 |
| 82 | 0.10 |
| 83 | 0.10 |
| 84 | 0.10 |
| 85 | 0.10 |
| 86 | 0.10 |
| 87 | 0.10 |
| 88 | 0.10 |
| 89 | 0.10 |
| 90 | 0.10 |
| 91 | 0.10 |
| 92 | 0.10 |
| 93 | 0.10 |
| 94 | 0.10 |
| 95 | 0.10 |
| 96 | 0.10 |
| 97 | 0.10 |
| 98 | 0.10 |
| 99 | 0.10 |
| 100 | 0.10 |
 - | | |
|-----|------|
| 1 | 0.11 |
| 2 | 0.10 |
| 3 | 0.10 |
| 4 | 0.10 |
| 5 | 0.10 |
| 6 | 0.10 |
| 7 | 0.10 |
| 8 | 0.10 |
| 9 | 0.10 |
| 10 | 0.10 |
| 11 | 0.10 |
| 12 | 0.10 |
| 13 | 0.10 |
| 14 | 0.10 |
| 15 | 0.10 |
| 16 | 0.10 |
| 17 | 0.10 |
| 18 | 0.10 |
| 19 | 0.10 |
| 20 | 0.10 |
| 21 | 0.10 |
| 22 | 0.10 |
| 23 | 0.10 |
| 24 | 0.10 |
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Speedy's Convenience Inc.

1300 W. I-40 Frontage #200-165

Gallup, NM. 87301-0165

1-800-722-6512

Date: 10 - 7 - 1996

Randy Stephenson
Ultramar Inc.
P.O. Box 468
525 W. Third St.
Hanford, CA. 93232-0466

Dear Mr. Stephenson

Re: Soil Samples

We have received our soil sampling information back from the lab and here is a copy of the results.

Sample

- L01 Southwest corner of tank hole 15 feet Down
- L02 Center east in tank hole 15 feet down
- L03 Center West in tank hole 15 Feet Down
- L04 Under southwest Dispenser
- L05 Under northwest Dispenser
- L06 Under southeast Dispenser
- L07 Under northeast Dispenser

If I can be of further assistance (505) 722-4170

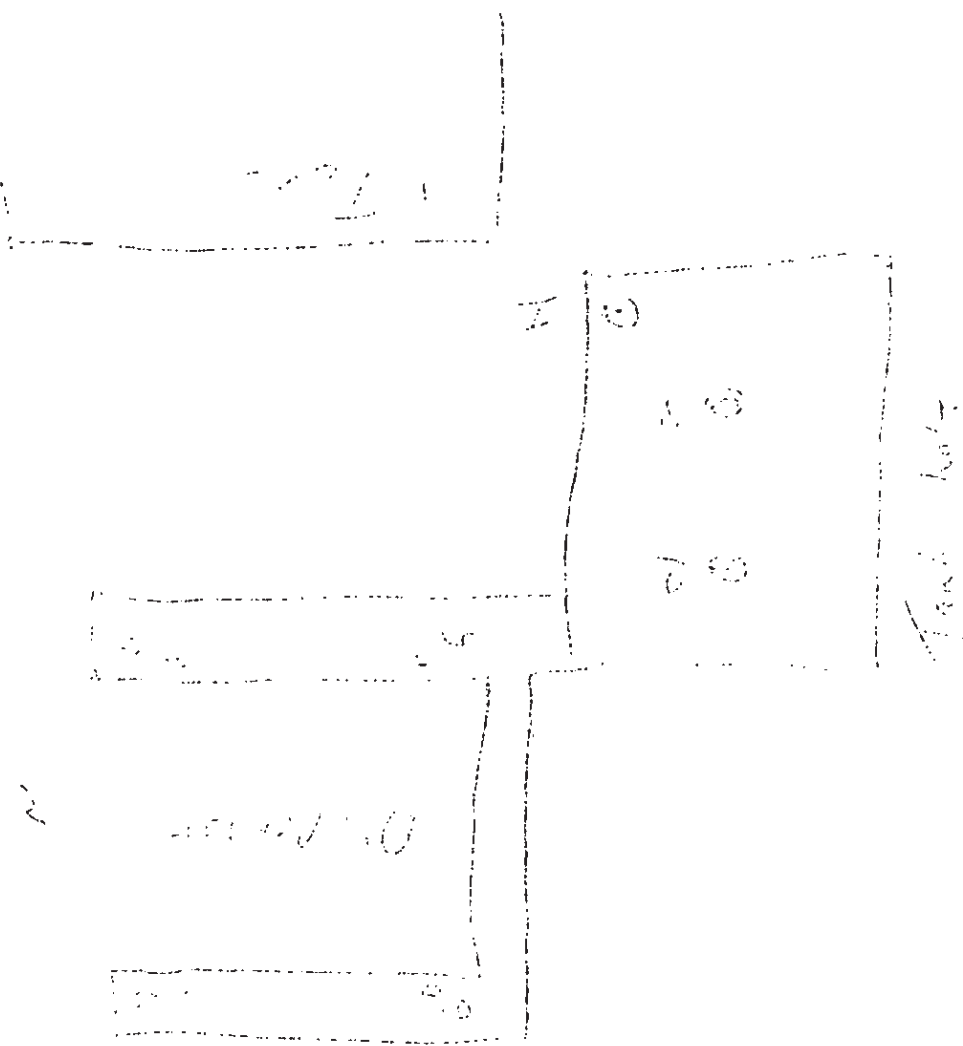
Thank You



Mark Nicholson

cc: Navajo EPA

BS010130



Diesel Fuel

BS010133

AUG 25 2005

BURGESS & NIPLE

Mr. Walt Guggenheimer
Underground Storage Tank Programs Office
United States Environmental Protection Agency
75 Hawthorne Street (WST-8)
San Francisco, CA 94105

Re Former Beacon Truck Stop #1265
Lupton, Arizona
WST-8, NAV-001

August 22, 2005

Dear Mr. Guggenheimer:

Burgess & Niple, Inc.
5025 East Washington Street
Suite 212
Phoenix, AZ 85034
602 244.8100
Fax 602 244.1915

Ultramar, Inc. (Ultramar) retained Burgess & Niple (B&N) to provide environmental consulting support associated with the referenced leaking underground storage tank (LUST) case file. The Environmental Protection Agency (EPA) and Navajo Nation EPA serve as the regulatory authority pertaining to the LUST release.

Ultramar has been monitoring the release since 1987 subsequent to the removal of the former UST system (Attachment I, Figures). The current UST system has been owned and operated by Speedy's Truck Stop since May 1996. Based on Ultramar's July 2003 groundwater investigation¹, two petroleum hydrocarbon sources appear to be contributing to the dissolved hydrocarbons detected in monitor wells MW-02A and MW-08. Due to the recent enforcement issues pertaining to the current owner/operator of the facility, EPA informed B&N that additional future groundwater monitoring and remedial measures would focus on the former UST pit adjacent to MW-02A and not in the vicinity of MW-08.

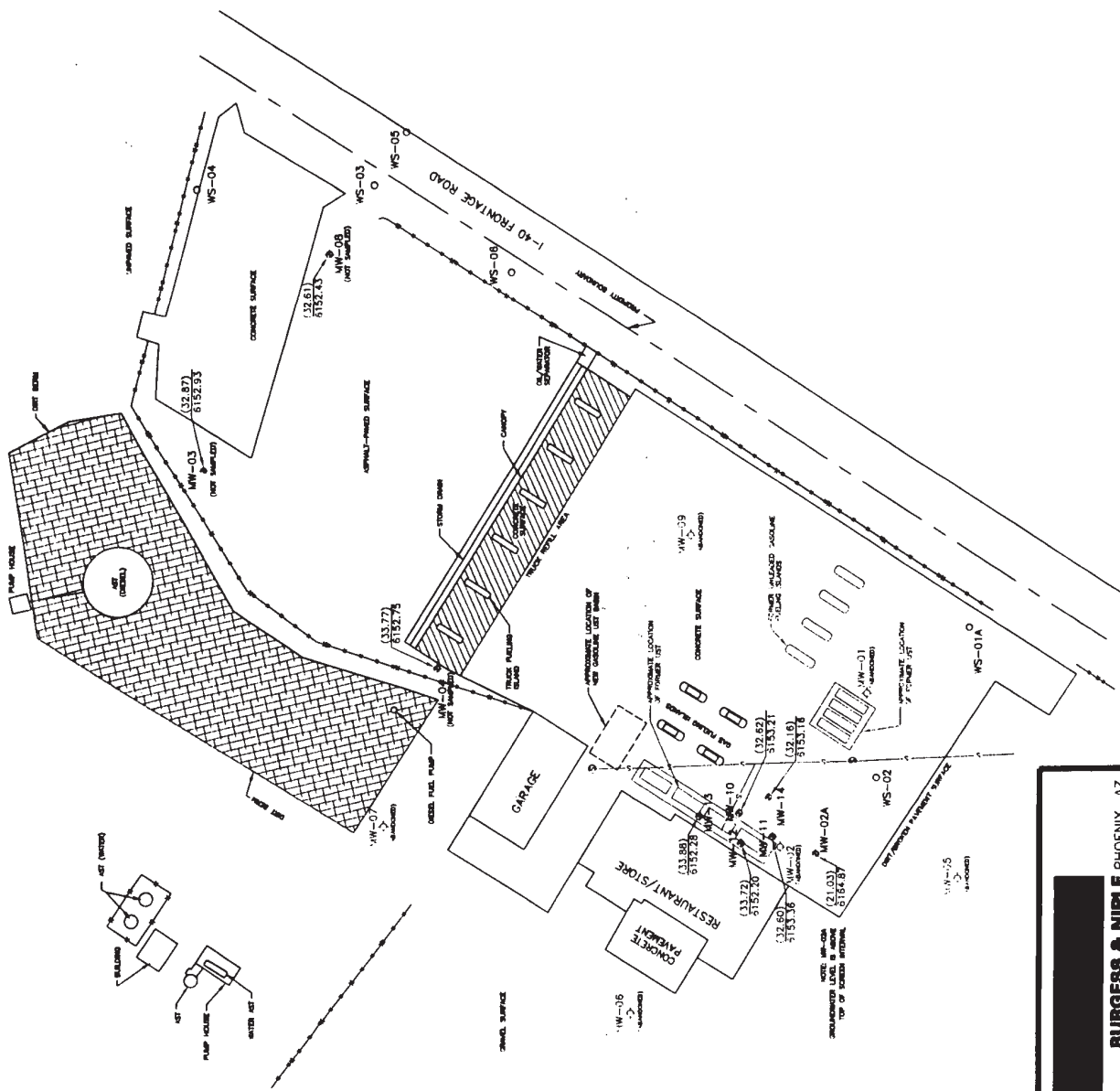
In response to EPA's request, Ultramar authorized the installation of five monitor/treatment wells (MW-10 through MW-14) within the former UST pit located adjacent to MW-02A. In addition to installing the wells, selected soil samples and groundwater samples were collected to evaluate the soil and groundwater petroleum hydrocarbon impacts within the former UST pit. The intent of collecting the additional analytical laboratory data was to develop a remedial approach best suited for the site conditions.

The soil and groundwater analytical results are presented on Table 1 and Table 2 (Attachment II, Tables). Soil analysis consisted of total petroleum hydrocarbons and benzene, toluene, ethylbenzene, total xylene and methyl tertiary butyl ether (BTEX & MTBE) via test methods Arizona Department of Health Services (ADHS) 8015AZR1 and EPA 8021B, respectively. Groundwater analysis consisted of BTEX & MTBE in accordance with EPA test method 8021B. In addition to the tabulated data, the groundwater analytical results are also presented on Figure 2 (Attachment I) and the analytical laboratory report is presented as Attachment III.

¹ Allen Stephenson & Associates, *Site Groundwater Investigation Report and Groundwater Sampling Activities, Former Beacon Truck Stop #652, Exit 359, Grant Road and Interstate 40, Lupton, Arizona*, October 29, 2003.



SCALE: 1" = 70'



LEGEND

MW-01
(32.81)
6153.43

DEPTH OF GROUNDWATER (FEET ABOVE TOP OF CASING)
GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL

MW-08
(32.81)
6153.43

GROUNDWATER MONITORING WELL LOCATION AND IDENTIFICATION

MW-11
(32.81)
6153.43

ABANDONED GROUNDWATER MONITORING WELL LOCATION

WS-05
(32.81)
6153.43

HYDROPLUNCH GROUNDWATER SAMPLING LOCATION (DRILLED & SAMPLED JULY 2003)

UST
(32.81)
6153.43

UNDERGROUND STORAGE TANK

AST
(32.81)
6153.43

ABOVE GROUND STORAGE TANK

— — — — —
FENCE

PROPERTY BOUNDARY

— — — — —
AREA ENCLOSED BY DIRT CONTAINMENT BERM

AREA ENCLOSED BY DIRT CONTAINMENT BERM

NOTE: THIS DRAWING ADAPTED FROM DELTA DRAWING NAME: FIGURE 1, DATED FEB. 11, 1997

GROUNDWATER ELEVATIONS
APRIL 9, 2005
BEACON TRUCK STOP #652
EXIT 359, GRANT ROAD AND I-40
LUPTON, ARIZONA

BURGESS & NIPLE PHOENIX, AZ

PROJECT NO.: 14514

APR 25 2006

BURGESS & NIPLE

Mr. Henry Haven, Geologist
Navajo Nation Environmental
Protection Agency
P.O. Box 339
Window Rock, Arizona 86515

Re: Groundwater Sampling Activities in the
Vicinity of the Former UST pit
Former Beacon Truck Stop #652
Lupton, Arizona
Facility I.D. #NAV-001L

April 20, 2006

Dear Mr. Haven:

Burgess & Niple, Inc.
5025 East Washington Street
Suite 212
Phoenix, AZ 85034
602 244.8100
Fax 602 244.1915

Burgess & Niple (B&N) is pleased to provide the following summary of groundwater sampling activities performed at the former Beacon Truck Stop #652 in Lupton, Arizona (Attachment I, Figure 1). The groundwater sampling activities were completed with reference to the tasks described in a letter sent to you dated December 2, 2005.

INTRODUCTION

B&N's groundwater sampling activities were completed on December 19th and 20th, 2005. The objective was to evaluate groundwater flow conditions and assess petroleum hydrocarbon impacts to the groundwater in the vicinity of the former UST pit adjacent to the restaurant (Attachment I, Figure 1).

BACKGROUND

Ultramar, Inc. (Ultramar) has retained B&N to provide environmental consulting support associated with the referenced leaking underground storage tank (LUST) case file. The Environmental Protection Agency (EPA) and Navajo Nation EPA serve as the regulatory authority pertaining to the LUST release. Ultramar has been monitoring the release since 1986. The former UST system operated by Ultramar was removed in 1996. The current UST system (installed in a separate location) has been owned and operated by Speedy's Truck Stop (Speedy's) since 1996.

In a report prepared by B&N, dated August 22, 2005 and submitted to Mr. Walt Guggenheimer with Region IX of the EPA, a summary of activities was given regarding the installation and sampling of five monitor/treatment wells in the vicinity of the former UST pit at the referenced site. In summary, the analytical laboratory results obtained from the installation and sampling of the monitor/treatment wells indicated the presence of elevated petroleum hydrocarbon concentrations. The elevated concentrations were unexpected, and suggested that the concentrations detected in the wells could be attributed to a second release that is not associated with the release that Ultramar has been monitoring for the last 20 years. It was also noted that these wells are located within 30 feet of Speedy's current active gasoline fuel dispensers. In an effort to determine whether the unexpected elevated petroleum hydrocarbon concentrations were attributed to the original

release, or to some other source, Ultramar elected to return to the site to evaluate groundwater flow conditions, and to perform additional sampling of the monitor/treatment wells located within the former UST pit, and more importantly, collect samples (groundwater and product) from the newly installed treatment wells for forensic analysis. Samples of regular, plus and premium-grade gasoline were also to be collected from Speedy's adjacent gasoline dispensers, and submitted for forensic analysis. The test results from the samples collected from the monitor wells would be compared to the test results from the samples collected from the fuel dispensers. A summary of B&N's field activities and findings are described herein.

METHODS

On December 19th, 2005 groundwater level measurements and product measurements were collected from monitor wells MW-02A, MW-03, MW-04, MW-08, MW-10, MW-11, MW-12, MW-13, and MW-14, in order to calculate the regional groundwater flow direction across the site, and to calculate the localized flow direction in the immediate vicinity of the former UST pit. On December 20th, 2005, groundwater samples were obtained from the monitor/treatment wells in the vicinity of the former UST pit, and from monitor well MW-4. Monitor well MW-4 is located northeast of the former UST pit (up- and cross-gradient of the former UST pit), and had not been sampled since July 7, 2003. Assessing MW-4 served to determine whether elevated petroleum hydrocarbons were also present in this monitor well, which is located closest to and down-gradient of the fuel processing plant and adjacent to Speedy's diesel fuel dispensers. Monitor wells MW-3 and MW-8 were not be sampled during this event. All of the groundwater sampling activities were performed by Steven Sutherland of B&N, an Arizona-registered geologist.

Prior to beginning any sampling activities, the static groundwater level measurements were collected from each of the existing monitor wells at the facility. The groundwater levels and their respective elevations are presented on Figure 1 (Attachment I).

Once the static groundwater levels were established, each of the wells were checked for the presence of a hydrocarbon sheen and/or free phase product. This task was accomplished with a clear disposable bailer for visual inspection, and then measured with an oil/water interface probe in cases where measurable product was identified via the visual inspection. If measurable product was identified in any of the wells, one sample of the product was collected for forensic analysis, and the remaining bailed product was placed into a 55-gallon drum for disposal. For those wells that did not exhibit measurable product, a minimum of three well casing volumes of water were purged from each well using a decontaminated 2-inch diameter Grundfos submersible pump. Purge rates ranged from one to two gallons per minute (gpm). The Grundfos pump was decontaminated between wells by pumping approximately 20 gallons of water mixed with a laboratory grade detergent through the pump, followed with a rinse of approximately 20 gallons of de-ionized water through the pump. The exterior of the pump and tubing was also scrubbed as necessary and rinsed in a similar fashion. Monitor well MW-02A was purged via hand-bailing using a new disposable bailer, due to the historically slow recovery of the well.

During the purging of each well, water quality field measurements were obtained and recorded. Water quality parameters, including pH, temperature, specific conductance and redox (oxidation/reduction potential) were obtained after approximately each well casing volume was purged. Also, qualitative descriptions were noted regarding the clarity and color of the water being purged, as well as any odors that were encountered. The readings were monitored to verify that these parameters had stabilized prior to sample collection.

Following completion of the well purging activities at each well, groundwater samples were collected using new disposable bailers and placed into laboratory-prepared sample containers. Each sample container was labeled with the sample number, the initials of the person collecting the sample, the date and time of sample collection, and the desired analyses, and was then placed into a cooler with ice, and then transported to Transwest Geochem, an Arizona-certified analytical laboratory (Arizona Department of Health Services License #AZ0133). The samples were transferred to the laboratory via thermally insulated cooler filled with ice. All samples remained under chain-of-custody documentation between the time of sampling and delivery to the laboratory. The monitor well samples were analyzed for benzene, toluene, ethylbenzene and total xylenes (BTEX) and MTBE (methyl-tertiary butyl ether) via EPA Method 8260B, and for full-range total petroleum hydrocarbons (TPH) via Arizona Department of Health Services (ADHS) Method 8015AZ.R01. The TPH analysis includes gas range petroleum hydrocarbons (GRO) in the C_6 to C_{10} range, diesel range hydrocarbons (DRO) in the C_{10} to C_{22} range, and oil range hydrocarbons (ORO) in the C_{22} to C_{32} range. The addition of reportable GRO, DRO, and ORO hydrocarbons represents the total petroleum hydrocarbon result for that sample (TPH).

In addition to the groundwater sampling activities, the three grades of gasoline dispensed at the site were sampled from an adjacent Speedy's dispenser. These fuel samples, a sample of product collected from monitor well MW-11, and a groundwater sample collected from monitor well MW-14 were submitted to Friedman & Bruya, a laboratory in Seattle, Washington that specializes in forensic analysis of fuel samples. The samples were transferred to the laboratory via thermally insulated cooler filled with ice. All samples remained under chain-of-custody documentation between the time of sampling and delivery to the laboratory. Each of the samples were analyzed for a hydrocarbon fuel scan via modified version of EPA Method 8015, and for a PIANO analysis (referring to paraffin, isoparaffin, aromatic, naphthalene, and olefin constituents). In addition, the product sample collected from monitor well MW-11 was also analyzed for organic lead speciation and manganese by a modified version of EPA Method 8082, and for total organic lead and manganese by a modified version of EPA Method 200.8.

GROUNDWATER FLOW CONDITIONS AND GROUNDWATER ANALYTICAL LABORATORY RESULTS

The regional groundwater flow direction at the site was calculated to be to the southeast (derived from groundwater elevation information collected from monitor wells MW-03, MW-08 and MW-14), at South 20 degrees East, with a gradient of 0.006. The localized flow direction in the immediate vicinity of the former UST pit was calculated to be to the northeast (derived from groundwater elevation information collected from monitor wells

MW-11, MW-13 and MW-14), at North 50 degrees East, with a gradient of 0.0915. Note that the elevation used from monitor well MW-11 was corrected for the presence of free phase product prior to the calculation of the flow direction (Figure 1).

Initial inspection of the monitor wells indicated the presence of free-phase product in monitor wells MW-10, MW-11 and MW-12, at thicknesses of 0.16 feet, 1.38 feet and 0.90 feet, respectively. Due to the presence of the product in these wells, groundwater samples were not collected. The laboratory analysis of the groundwater samples collected from monitor wells MW-02A, MW-04, MW-13 and MW-14 indicated detectable BTEX constituent concentrations in each of the samples. None of the samples exhibited any MTBE concentrations in excess of the laboratory reporting limit. MW-02A, MW-13 and MW-14 exhibited benzene concentrations in excess of its MCL, at 10 micrograms per liter ($\mu\text{g/l}$), 2,900 $\mu\text{g/l}$, and 31,000 $\mu\text{g/l}$, respectively. In addition, MW-14 exhibited toluene and ethylbenzene in excess of their respective MCLs, at 21,000 $\mu\text{g/l}$ and 2,000 $\mu\text{g/l}$. None of the other reportable BTEX concentrations exceeded any regulatory levels (Figure 2).

Reportable GRO and DRO concentrations were also present in the groundwater samples collected from MW-13 and MW-14, with TPH concentrations at 9.2 and 79.1 milligrams per liter (mg/l), respectively. Currently, there are no EPA regulatory levels for TPH.

A summary of the analytical results for all of the groundwater monitor well samples is presented in Table 1 (Attachment II). The Transwest Geochem analytical laboratory report and chain-of-custody documentation are presented in Attachment III. The analytical report identifies the analytical method, sample media and collection date, extraction date, analyses date, and reporting limit of the laboratory analyses.

PRODUCT ANALYTICAL LABORATORY RESULTS

The samples collected from monitor wells MW-11 and MW-14 and from the fuel dispensers were analyzed via modified version of EPA Method 8015 (hydrocarbon fuel scan) and for the PLANO constituents (as previously described). A correlation of the test results of the dispenser samples and the samples collected from the monitor wells was inconclusive. The data showed that some degradation has occurred to the samples collected from the wells, and a probable release date could only be accurately reported as being 'two or more years ago'. In addition, the report indicated that the fuel dispenser samples showed lower levels of isooctane and isoparaffins than what was indicated in the product sample from MW-11. If the product in MW-11 had originated from the fuel dispenser area and the dispensed fuel formulations remained unchanged at the site, then the product would be expected to have lower levels of isooctane and isoparaffins than the original product.

In an effort to further characterize the product identified in the monitor wells, the product collected from monitor well MW-11 was analyzed for lead content (as previously described). The results of the organic lead speciation indicated the presence of tetraethyl lead (TEL) at 55 micrograms per gram ($\mu\text{g/g}$), trimethylethyl lead (TMEL) at 2 $\mu\text{g/g}$, and methyltriethyl lead (MTEL) at 1 $\mu\text{g/g}$. In addition, the total organic lead analysis also indicated the presence of organic lead at 45.3 $\mu\text{g/g}$. The TEL, TMEL and MTEL are not

naturally occurring compounds. TEL is one of the more prevalent lead additives in gasoline since first being introduced as an antiknock compound in the 1920's. Due to the promulgation of the Clean Air Act regulations by the EPA, the use of lead additives in gasoline was discontinued as of December 31, 1987.

The Friedman & Bruya analytical laboratory report and chain-of-custody documentation are presented in Attachment IV. The analytical report identifies the analytical method, sample media and collection date, extraction date, analyses date, and reporting limit of the laboratory analyses.

INVESTIGATIVE DERIVED WASTE

The groundwater sampling activities and removal of the free-phase product from monitor wells MW-10, MW-11 and MW-12 was contained in two 55-gallon drums. Upon completion of the activities at the site, the drums were secured, and then appropriately labeled. Subsequently, arrangements were made Philip Transportation and Remediation (ROC#100177), a division of Philip Services Corporation (PSC), for the transportation and disposal of the investigative derived waste. The drums were appropriately manifested, and then removed from the site by PTR in January 2006 for disposal.

CONCLUSIONS AND RECOMMENDATIONS

The calculated groundwater flow from this round of sampling activities indicates variable flow directions at the site. The flow directions indicate a similar consistency to historically reported conditions at the site, where the flow directions appear to converge within the central portion of the site. Although variable at the site, regional groundwater flow conditions likely flow southerly, in the general trend of the valley axis.

Dissolved phase hydrocarbons detected in monitor wells MW-02A, MW-13 and MW-14 exceeded one or more of the MCLs established for BTEX compounds. Dissolved phase hydrocarbons detected in monitor well MW-14 were reported at concentrations that suggest that free phase product may also be present. Monitor well MW-14 is located approximately 20 feet southeast of the former gasoline UST pit area.

Since product was not identified in monitor wells MW-02A, MW-10 and MW-14, the lateral extent of the product appears to be localized within the western portion of the former UST pit, with the greatest measurable amount in the vicinity of monitor well MW-11.

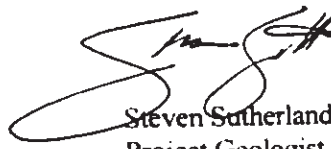
While the correlation of the hydrocarbon fuel scan and PIANO analysis of the samples collected from the fuel dispensers and from the monitor wells was inconclusive, the presence of lower concentrations of isooctane and isoparaaffins in the product sample collected from MW-11 indicates that the free phase product is not consistent with the three fuel grades being dispensed on December 20, 2005.

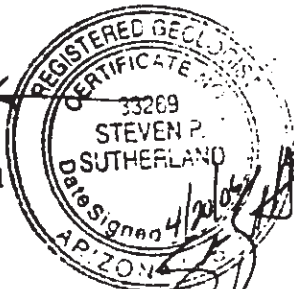
Analysis of the free phase product for organic lead confirmed the presence of TEL, TMEL, and MTEL. The speciated lead compounds indicate that the product sample collected from MW-11 was originally a formulated leaded gasoline.


Although the field activities performed by B&N suggest that a portion of the free phase product may have originated from the original UST system, active monitoring should continue as other sources may be contributing to the hydrocarbon impacts detected at the site. Due to the presence of the free phase product, B&N recommends that a product recovery program be implemented at the site. In the interim of removing the product, B&N recommends evaluating remedial alternatives to optimize source removal within the former UST pit.

This letter report has been prepared in accordance with the industry's standard level of care. B&N does not warrant the information provided to us from third parties. The opinions expressed within this document are the professional opinion of B&N and are based upon our understanding of the project as of this date. Should you have any questions regarding any portion of this report, please contact Mr. Dino Gotsis, B&N's Project Manager at (602) 244-8100 or Mr. Robert D. Fishburn, Ultramar's Marketing Environmental Supervisor at (559) 583-3345.

Sincerely,


Steven Sutherland
Project Geologist



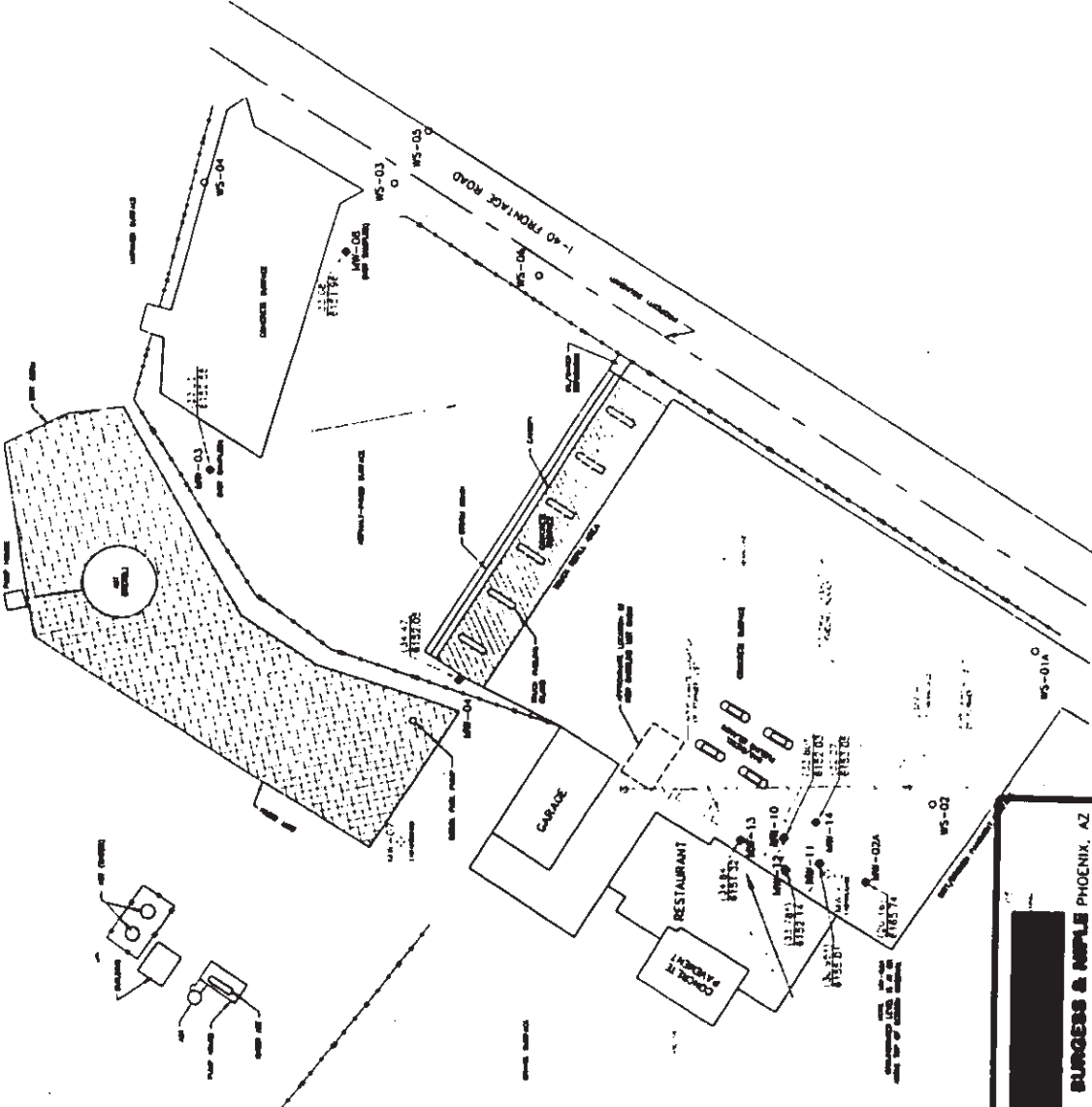

Dino Gotsis
Project Manager

copy: Robert Fishburn, Ultramar
Walt Guggenheimer, U.S. EPA

Attachments:

- Attachment I - Figures
- Attachment II - Table
- Attachment III - Transwest Geochem Laboratory Analytical Results
- Attachment IV - Friedman & Bruya Laboratory Analytical Results

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LEGEND

- WS-01, WS-02, WS-03, WS-04, WS-05, WS-06, WS-07, WS-08, WS-09, WS-10, WS-11, WS-12, WS-13, WS-14
- DEPTH TO GROUNDWATER (FEET BELOW TOP OF CASING) AND GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL
- CORRECTED DEPTH TO GROUNDWATER AND GROUNDWATER ELEVATION (FLOATING PRODUCT OBSERVED IN MONITOR WELL - SEE FIG 2 FOR DETAIL)
- GROUNDWATER MONITORING WELL LOCATION AND IDENTIFICATION
- ABANDONED GROUNDWATER MONITORING WELL LOCATION
- HYDROFRANCH GROUNDWATER SAMPLING LOCATION (DRILLED & SAMPLED JULY 2003)
- UST
- UNDERGROUND STORAGE TANK
- AST
- ABOVE GROUND STORAGE TANK
- PROPERTY BOUNDARY
- FENCE
- AREA ENCLOSED BY DIRT CONTAINMENT BERM

NOTE: THIS DRAWING, ALTHOUGH MADE TO THE BEST OF OUR KNOWLEDGE, IS NOT A GUARANTEE OF ACCURACY. FIGURE 1 DATED FEB 11 1997

GROUNDWATER ELEVATIONS
 DECEMBER 19TH-20TH, 2005
 BEACON TRUCK STOP #652 EXIT
 359, GRANT ROAD AND I-40
 LUPTON, ARIZONA

FIGURE 1

BURGESS & NIPLE PHOENIX, AZ

SOURCE NO: 54874

Soil Data Table